LAGUNA HONDA HOSPITAL REPLACEMENT

SAN FRANCISCO PLANNING DEPARTMENT

SUMMARY OF COMMENTS AND RESPONSES

JUNE 17, 2002

FILE NO. 2000.005E

STATE CLEARINGHOUSE NO. 2001022015

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FINAL EIR CERTIFICATION DATE: JUNE 27, 2002

San Francisco Planning Department

June 17, 2002

Laguna Honda Hospital Replacement
Comments and Responses

File No. 2000.005E
State Clearinghouse No. 2001022015

Draft EIR Publication Date: December 1, 2001

Draft EIR Public Hearing Date: January 10, 2002

Draft EIR Public Comment Period: December 1, 2001 through January 16, 2002

Final EIR Certification Date: June 27, 2002

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1.0 INTRODUCTION

This is the Comments and Responses document for the Laguna Honda Hospital Replacement Environmental Impact Report (EIR). The Draft EIR was published on December 1, 2001 and the public comment period extended through January 16, 2002. A public hearing before the San Francisco Planning Commission was held on January 10, 2002 to receive comments on the accuracy and adequacy of the information contained in the Draft EIR. A list of all persons who made comments on the Draft EIR, either orally at the public hearing or in writing up until 5:00 PM on January 16, 2002, is presented in Chapter 3.0. These comments are reproduced in Chapter 4.0 and are followed by responses. Text changes to the Draft EIR that are made in response to comments are also contained in Chapter 4.0. Staff-initiated changes to the Draft EIR are presented in Chapter 5.0. Copies of all comment letters and a copy of the public hearing transcript are provided in **Appendix 1.0**. Individual comments in letters and transcript in **Appendix 1.0** are bracketed and numbered to correspond to the numbering of comments and associated responses in Chapter 4.0.

During the public review period, the Department of Public Health (the project sponsor) identified a new alternative that would allow for the preservation of a larger portion of the Main Hospital Building. A description of this alternative, which is the sponsor's preferred alternative, and an assessment of its environmental impacts are presented in Chapter 2.0.

This Comments and Responses document, together with the Draft EIR as amended by text changes indicated in this document, constitutes the Final EIR for the Laguna Honda Hospital Replacement project.

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2.0 PREFERRED ALTERNATIVE THREE- PARTIAL PRESERVATION ALTERNATIVE

During the public review period, the Department of Public Health (the project sponsor) identified a new alternative that would allow for the preservation of a larger portion of the Main Hospital Building. This new alternative, called "Partial Preservation Alternative Three," is similar to Partial Preservation Alternative Two, already presented in the Draft EIR. A description of Alternative Three, which is the sponsor's preferred alternative, and an assessment of its environmental impacts are presented in this chapter. The description and assessment of Alternative Three are hereby added to **Chapter 6.0, Alternatives to the Proposed Project,** *as a new section A4(c) on page (p.) 6.0-18 of the Draft EIR, prior to the discussion of the No Project Alternative. The phasing plans for Alternative Three are hereby added to* **Appendix 6.0,** *and are included at the end of this chapter on pp. C&R 15 to 36.*

CEQA requires the recirculation of the Draft EIR after the close of the public review period, prior to certification of the Final EIR, if "significant new information" is added to the Draft EIR. The CEQA Guidelines note, as an example of "significant new information," a new project alternative, which is "...considerably different from others previously analyzed, that clearly would lessen the environmental impacts for the project but that the project's proponents decline to adopt." A comparison of the assessment of Alternative Three, described below, to the assessment of Alternative Two, presented on p. 6.0-13 through p. 6.0-18 of the Draft EIR, demonstrates that the impacts associated with Alternative Three would be substantially similar to the impacts associated with Alternatives One and Two, particularly to Alternative Two. In addition, the project proponents would be willing to adopt Alternative Three, as indicated by its designation as the project sponsor's preferred alternative. The public will be afforded the opportunity to review and comment on the new alternative as part of this document and the Planning Commission hearing on the certification of the EIR. For the reasons stated above, the inclusion of Alternative Three does not meet the standard of "significant new information" as defined by CEQA.

The Initial Study for the proposed project found the project's air quality/shadow effects to be less than significant. However, the EIR will be revised to include an analysis of project shadow effects pursuant to Proposition K, because the proposed project has been refined subsequent to the completion of the Initial Study. Therefore, the analysis of Alternative Three presented below includes a discussion of shadow.[1]

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1 Please refer to **Section 5.0, Staff-Initiated Changes** to the Draft EIR, for a detailed discussion of the shadow effects of the proposed project.

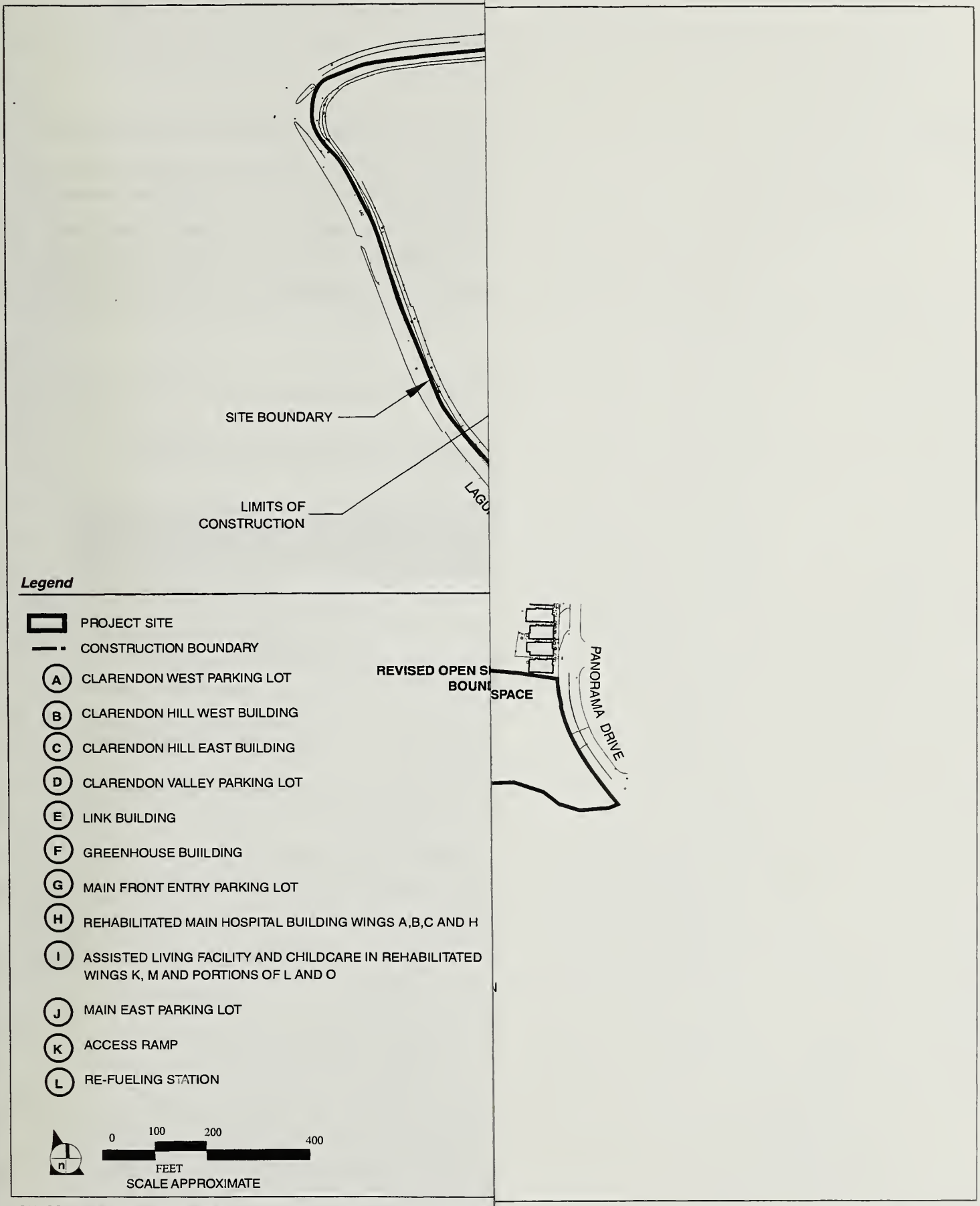
A4(c) Partial Preservation Alternative Three

Description

Like Alternative Two, Partial Preservation Alternative Three would meet the spatial, service, and technical needs of Laguna Honda hospital while preserving and/or retrofitting some of the historic features of the buildings and site. As shown in **Figure 6.0-3, Alternative Three: Site Plan**, this alternative would retain and rehabilitate portions of Wings A, B, C, and H of the Main Hospital Building for administrative use, and retain and rehabilitate Wings K and M and portions of Wings L and O of the Main Hospital for use as an assisted living facility and childcare facility. The assisted living facility would contribute 140 beds to the new hospital. The new Greenhouse and Clarendon Hill East and West Buildings would provide 1,140 new hospital beds, and be similar to the proposed project in size, building placement, and design. Similar to the proposed project, the proposed Clarendon Hill East and West Buildings would have a total of eight wings. Two wings would face north, four wings would face south, one wing would face west and one would face east. The new Clarendon Hill West and East Buildings would connect to the proposed Link Building, as described for the proposed project. The new Link Building would be the same size as the new Link Building under the proposed project and would also provide 60 beds. The new Link Building, similar to the proposed project, would connect to the northern end of Wing H of the existing Main Hospital Building by a two-story connector building. Including assisted living beds, the total number of beds provided in Alternative Three would be 1,340, the same as for the proposed project.

Similar to the proposed project, Partial Preservation Alternative Three would be achieved through a series of construction phases that would allow the facility to remain functional during the development of new buildings. Residents would be relocated into the new buildings upon completion and Wings K and M and portions of Wings L and O of the Main Hospital Building would be used for an assisted living facility. Further, temporary parking would be provided during construction and, upon project completion, the bulk of parking would be in the Main East Lot, New Clarendon West Lot, and West Valley Lot (similar to the proposed project). Upon completion of Partial Preservation Alternative Three, approximately 655 parking spaces and 11 loading spaces would be provided on site, the same as under the proposed project.

Although the basic characteristics of Alternative Three are largely the same as under the proposed project, the reconfiguration of the parking lots, the square footage of the assisted living facility, and the configuration of the Link Building are somewhat different under this alternative. As shown in **Figure 6.0-3**, the New Clarendon West parking lot would extend further to the northwest, southwest, and northeast than under the proposed project (refer to **Figure 2.0-4** for the proposed project site plan).



SOURCE: Anshen + Allen Architects

FIGURE **6.0-3**

Alternative Three: Site Plan

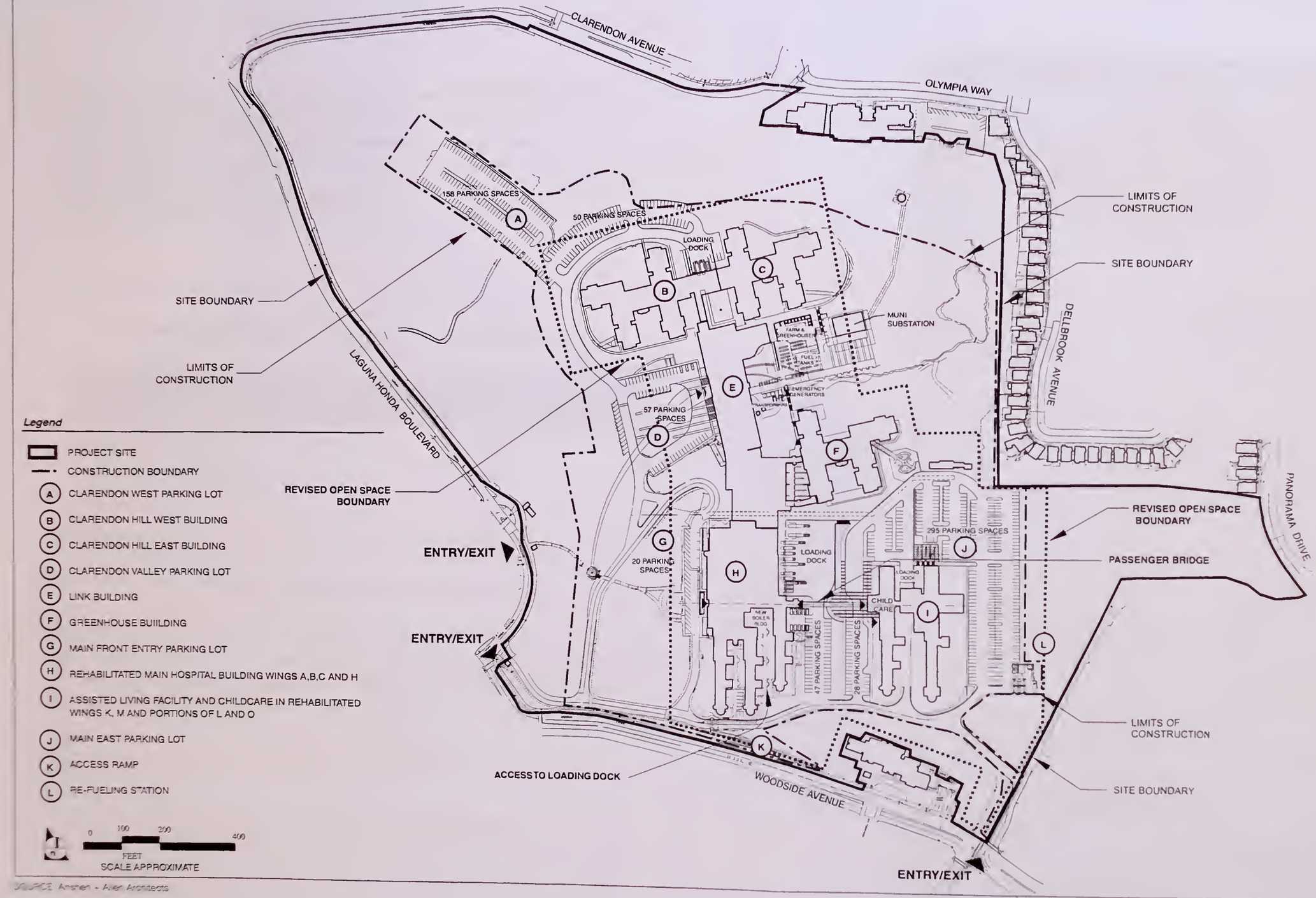
A4(c) Partial Preservation Alternative Three

Description

Like Alternative Two, Partial Preservation Alternative Three would meet the spatial, service, and technical needs of Laguna Honda hospital while preserving and/or retrofitting some of the historic features of the buildings and site. As shown in **Figure 6.0-3, Alternative Three: Site Plan**, this alternative would retain and rehabilitate portions of Wings A, B, C, and H of the Main Hospital Building for administrative use, and retain and rehabilitate Wings K and M and portions of Wings L and O of the Main Hospital for use as an assisted living facility and childcare facility. The assisted living facility would contribute 140 beds to the new hospital. The new Greenhouse and Clarendon Hill East and West Buildings would provide 1,140 new hospital beds, and be similar to the proposed project in size, building placement, and design. Similar to the proposed project, the proposed Clarendon Hill East and West Buildings would have a total of eight wings. Two wings would face north, four wings would face south, one wing would face west and one would face east. The new Clarendon Hill West and East Buildings would connect to the proposed Link Building, as described for the proposed project. The new Link Building would be the same size as the new Link Building under the proposed project and would also provide 60 beds. The new Link Building, similar to the proposed project, would connect to the northern end of Wing H of the existing Main Hospital Building by a two-story connector building. Including assisted living beds, the total number of beds provided in Alternative Three would be 1,340, the same as for the proposed project.

Similar to the proposed project, Partial Preservation Alternative Three would be achieved through a series of construction phases that would allow the facility to remain functional during the development of new buildings. Residents would be relocated into the new buildings upon completion and Wings K and M and portions of Wings L and O of the Main Hospital Building would be used for an assisted living facility. Further, temporary parking would be provided during construction and, upon project completion, the bulk of parking would be in the Main East Lot, New Clarendon West Lot, and West Valley Lot (similar to the proposed project). Upon completion of Partial Preservation Alternative Three, approximately 655 parking spaces and 11 loading spaces would be provided on site, the same as under the proposed project.

Although the basic characteristics of Alternative Three are largely the same as under the proposed project, the reconfiguration of the parking lots, the square footage of the assisted living facility, and the configuration of the Link Building are somewhat different under this alternative. As shown in **Figure 6.0-3**, the New Clarendon West parking lot would extend further to the northwest, southwest, and northeast than under the proposed project (refer to **Figure 2.0-4** for the proposed project site plan).



SOURCE: Anshen + Allen Architects

FIGURE 6.0-3

Alternative Three: Site Plan

Parking spaces in the Main East parking lot would include spaces between the Main Hospital Building and the proposed assisted living facility. Parking spaces would also be located north and east of the assisted living facility. **Table 6.0-2, Differences Between Partial Preservation Alternative Three and the Proposed Project Parking Spaces**, shows the difference in the number of parking spaces for each proposed parking lot. Although the parking lots would differ in their shape and number of parking spaces, the total number of parking spaces would remain at 655, the same as the proposed project.

Table 6.0-2
Differences Between Partial Preservation Alternative Three and the Proposed Project Parking Spaces

	Proposed Project # of Parking Spaces	Alternative Three # of Parking Spaces
Main East Parking Lot	340	370
Main Front Entry Parking Lot	24	20
Clarendon Valley Parking Lot	119	57
New Clarendon West Parking Lot	164	208
Service Driveways	8	0
Total Parking Spaces	**655**	**655**

The square footage of the assisted living facility would be slightly higher than under the proposed project. Under this alternative, the assisted living facility would be 109,000 gross square feet, 14,000 gross square feet more than the proposed project. **Table 6.0-3** provides a summary comparison of the characteristics of Alternative Three to the proposed project.

Table 6.0-3
Summary Comparison of Partial Preservation Alternative Three to Proposed Project

	# Stories	# Beds	Approx. Gross Square Footage
Proposed Project			
Old Main Hospital Building (Wings A, B, C, and H)	3 to 5	0	204,931
New Clarendon Hill West Building	7	420	195,474
New Clarendon Hill East Building	7	420	195,474
New Connector between Clarendon Buildings	2	0	8,144
New Greenhouse Building	5	300	146,976
New Connector between Link Building and Greenhouse Building	2	0	2,032
New Link Building	4	60	138,879
New Assisted Living Facility	4	140	95,000
Total		**1,340**	**986,910**
Partial Preservation Alternative Three			
Old Main Hospital Building (Wings A, B, C, and H)	3 to 5	0	204,931
Old Main Hospital Building (Wings K and M and portions of L and O)/New Assisted Living Facility	3 to 5	140	109,000
New Clarendon Hill West Building	7	420	195,474
New Clarendon Hill East Building	7	420	195,474
New Connector between Clarendon Buildings	2	0	8,144
New Greenhouse Building	5	300	146,976
New Connector between Link Building and Greenhouse Building	2	0	2,032
New Link Building	4	60	138,879
Total		**1,340**	**1,000,910**

Source: Architectural Resources Group, Schematic Design, June 28, 2001.

Another difference between Partial Preservation Alternative Three and the proposed project would be the configuration of the Link Building. Under this alternative, the proposed Link Building would extend further east at both ends of the building. The extension on the northern end of the Link Building would provide a one-story rehabilitation center instead of a childcare center as under the proposed project. The childcare center and associated playground would be located in the new assisted living

facility adjacent to the Main Hospital Building. Although the design of the Link Building would be slightly different than under the proposed project, the total square footage would be the same as under the proposed project. Similar to the proposed project, Partial Preservation Alternative Three would be implemented in three major phases. The phasing plans for this alternative are included **Appendix 6.0** of this document. In general, construction Phase One consists of Phases A through D; Phase Two is generally the same as Phase E; Phase Three-A is generally the same as Phases F through H; and Phase Three-B is generally the same as Phases I and J.

Environmental Analysis

The Initial Study prepared for the proposed project determined that impacts in the following issue areas would be less than significant: population, operational noise, air quality (air quality standards, pollutant concentrations, odors, and wind), utilities/public services, biology, geology/topography, water, energy/natural resources, hazards (emergency response plans and fire hazards), and archaeological and paleontological resources. It should be noted that the analyses provided in the Initial Study, conducted for the above-mentioned resources, pertain to the entire property. For example, the biology analysis considered the biological impacts to the entire site and not just the developed portion of the campus. In addition, implementation of this alternative would result in the same increases in site use by residents, employees, and visitors as the proposed project. Therefore, the extended construction boundary would not result in an increase in impacts in the above issue areas analyzed in the Initial Study.

The Initial Study for the proposed project also found that the air quality/shadow effects of the project would be less than significant. However, the Draft EIR, as amended, includes an analysis of project shadow effects pursuant to Proposition K (please refer to pp. C&R 161 to 173, **Chapter 5.0** of this document), because the proposed project has been refined subsequent to the completion of the Initial Study. Therefore, the analysis of this alternative also includes a discussion of shadow.

Land Use and Planning

The proposed development of Partial Preservation Alternative Three would be consistent with the current use of the site as a hospital. The proposed assisted living facility would provide assisted care and housing opportunities for the elderly and disabled, which would be consistent with the current use of the site and the residential uses in the surrounding neighborhood.

As with the proposed project, the proposed buildings under this alternative would not comply with the height requirements of the 80-D height and bulk district, which would require a rezoning from the 80-foot height district to the 90-foot height district. In addition, the proposed buildings would not

conform to the bulk requirements. Pursuant to Section 271 (b) of the Planning Code, deviations from bulk limits shall be permitted upon approval of the Planning Commission according to the procedures for Conditional Use approval in Section 303 of the Code. This required change would be the same as for the proposed project.

Figure 2.0-4, Proposed Site Plan, has been refined to include the revised open space boundary proposed as a result of the project. The existing open space boundary is a general schematic and has not been clearly defined by the City Planning Department. The City Planning Department has recently determined that because the proposed project would result in only minor and very specific changes in the open space boundary and would not change the general configuration, a *General Plan* Amendment is not needed to justify the proposed project.[1]

The proposed use of the site as a public hospital and assisted living facility is consistent with the site's *General Plan* designation.

Transportation, Circulation, and Parking

Partial Preservation Alternative Three would have essentially the same transportation and circulation impacts as the proposed project (less than significant). Operational impacts would be the same, because the size of the facilities, number of employees, and amount of traffic generated would be the same. Construction-related traffic would be similar to that generated by the proposed project because the construction phasing and duration would be similar. Parking impacts would be the same for construction since the same amount of parking would be provided as with the proposed project. Alternative Three would also result in a shortage of parking relative to demand, but the impact would not be considered to be significant because of the availability of on-street parking and the opportunities to re-designate non-employee parking on the project site. Loading impacts would be the same as under the proposed project (less than significant) because the same number of loading spaces would be provided and the demand would be similar.

Visual Quality

Impacts to visual quality under Alternative Three would be similar to those of the proposed project. The primary difference would be from retaining Wings K and M and portions of Wings L and O of the Main Hospital Building. The view looking east from Laguna Honda Boulevard (**Figure 3.3-2** in **Section**

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1 Crawford, Rick, San Francisco Planning Department, telephone conversation, June 4, 2002.

3.3, Visual Quality) would be essentially the same as it would be under the proposed project. Since Wings K and M and portions of Wings L and O of the Main Hospital Building would be retained under this alternative, the view of the project site as seen from Edgehill Way (**Figure 3.3-3** in **Section 3.3, Visual Quality**) would remain essentially the same as it is today. Therefore, this alternative would not result in a significant impact to views from Edgehill Way. The significant impact to the view from Twin Peaks Park would occur under this alternative, as under the proposed project, because the Link Building would still be constructed and would be of similar scale and mass as under the proposed project.

Impacts related to tree removal and light and glare would be similar to those of the proposed project (less than significant). The land area used for development would be similar to that under the proposed project, and the majority of the trees on the project site and the tree buffer would still be preserved. The additional lighting sources associated with the larger New Clarendon West Parking Lot would not represent a substantial new source of light, given the overall developed nature of the area.

Construction Noise

The primary difference in construction noise impacts with Alternative Three compared with the proposed project would be that the noise associated with demolition of existing Wings K and M and construction of the new assisted living facility would not occur. Noise associated with renovation of Wings K and M and portions of Wings L and O would be generated, but it would be at reduced levels compared to noise associated with demolition and new construction. Therefore, noise impacts to hospital residents, residents of the senior living facility, and residents of homes south of Woodside Avenue during this period would be reduced compared to the proposed project. However, since Wings D, E, G, and F and portions of Wings L and O would still be demolished under this alternative, noise impacts to hospital residents and the residents of the senior housing facility would still be significant during construction Phase Three-B, although of less intensity and duration than with the proposed project. Construction noise levels associated with trucks and pavers would, at times, exceed the City's Noise Ordinance 80-dBA noise limit (at 100 feet). This is considered to be a significant impact and would be the same as under the proposed project. Construction noise impacts during the other construction phases with this alternative would be similar to those of the proposed project.

Historic Architectural Resources

Alternative Three would retain and rehabilitate Wings A, B, C, and H of the Main Hospital Building for administrative use and Wings K and M and portions of Wings L and O for an assisted living facility and childcare center. As discussed in **Section 3.5, Historic Architectural Resources**, the Laguna Honda hospital campus as a whole appears eligible as a NRHP district, and Clarendon Hall and the Main Hospital Building appear eligible for the NRHP as individual buildings. Therefore, impacts to

historic architectural resources would be reduced under this alternative compared to the proposed project, because more of the Main Hospital Building would be preserved. Nonetheless, the impacts of this alternative on historic architectural resources would remain significant.

Hazards

Impacts related to hazards would be the same as for the proposed project. Because the project sponsor would be required to comply with existing rules and regulations pertaining to the removal and disposal of asbestos and lead-based paint, no significant impacts regarding those materials would occur.

Construction workers may encounter soil and/or groundwater contamination during site preparation activities, potentially exposing them and the public to hazardous substances. This would be the same as for the proposed project and is considered a potentially significant impact.

Shadow

The placement, size, and shape of the proposed Clarendon Hill West and East Buildings under this alternative would be identical to the proposed project. Subsequent to the completion of the Initial Study, a quantitative shadow analysis was prepared for the proposed project and is discussed in detail in **Section 3.7, Shadow** of the revised Draft EIR. (Please refer to pp. C&R 161 to 173, **Chapter 5.0** of this document.) The findings of this shadow analysis would also apply to Alternative Three due to the identical nature of the proposed buildings. Therefore, similar to the proposed project, Alternative Three would not cast significant shadows on the adjacent Midtown Terrace Park, and for environmental purposes, shadow impacts would be less than significant for this alternative. (As with the proposed project, the Planning Commission, acting with the advice of the Recreation and Park Commission, will determine whether the shadow cast on Midtown Terrace Park is or is not significant, under Planning Code Section 295. Given the analysis and conclusions in this document, it is anticipated that the Planning Commission and Recreation and Park Commission will determine that the shadow impacts are not significant under Section 295 of the Planning Code.)

Relation to the Project Objectives

Like the proposed project, Alternative Three would satisfy all of the 20 project objectives. Preserving Wings K and M and portions of Wings L and O would allow the development of adequately-sized, level, covered access to the Adult Day Health Care and Senior Nutrition Program areas. Alternative Three would achieve Objective 17, recognize site history, better than the proposed project since more of the Main Hospital Building would be preserved. Objective 18, separating service traffic from other traffic, would be achieved because this alternative demolishes Wings D, E, F, and G, which allows access to the loading docks. The cost of upgrading two whole wings, Wings K and M and portions of

Wings L and O to meet current seismic standards is expected to be similar to the cost of clearing the site and building a new assisted living building under the proposed project.

Conclusion

Alternative Three would reduce the level of impacts to historic architectural resources by retaining Wings K and M and portions of Wings L and O of the Main Hospital Building. Although other wings would be demolished under this alternative, the retention of the additional wings would leave more of the original building intact. However, impacts to historic architectural resources would still be significant. Construction noise levels during Phase Three-B would be lower than under the proposed project, but would still be significant. Impacts to transportation, circulation, and parking would be less than significant, similar to the proposed project. Impacts regarding land use and planning and would be similar to those of the proposed project; i.e., less than significant. This alternative would have the same significant impact to views from Twin Peaks Park as under the proposed project. Because the size, placement, and design of the proposed Clarendon Hill West and East Buildings are identical to the proposed project, shadow impacts would be similar to the proposed project. Alternative Three would meet all 20 of the project objectives.

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APPENDIX 6.0

Alternative Three Hospital Building Elevations

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(A1) CLARENDON HALL – 162 BEDS

(A2) MAIN HOSPITAL BUILDING – 987 BEDS

(A3) EXISTING LAUNDRY

(A4) EXISTING BOILER ROOM

(A5) EXISTING PROPANE TANKS

(A6) EXISTING VEHICLE FUELING STATION

(A7) EXISTING HAZ. MAT. SHED

(A8) EXISTING FARM BUILDING

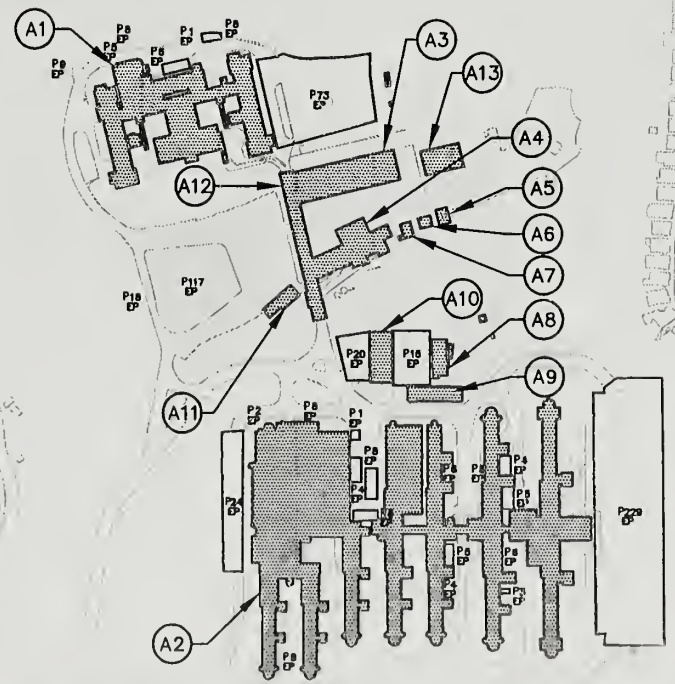
(A9) EXISTING GREENHOUSE

(A10) EXISTING SHOPS

(A11) EXISTING GARAGE

(A12) EXISTING BRIDGE BUILDING

(A13) EXISTING MUNI SUBSTATION



603 EXISTING PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE A - EXISTING

ACCESS & PRE-CONSTRUCTION

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(B1) VACATE LAUNDRY

(B2) VACATE ENGINEERING SHOPS, GREENHOUSE AND FARM

(B3) VACATE HAZ. MAT. BUILDING

(B4) BUILD INTERIM FARM

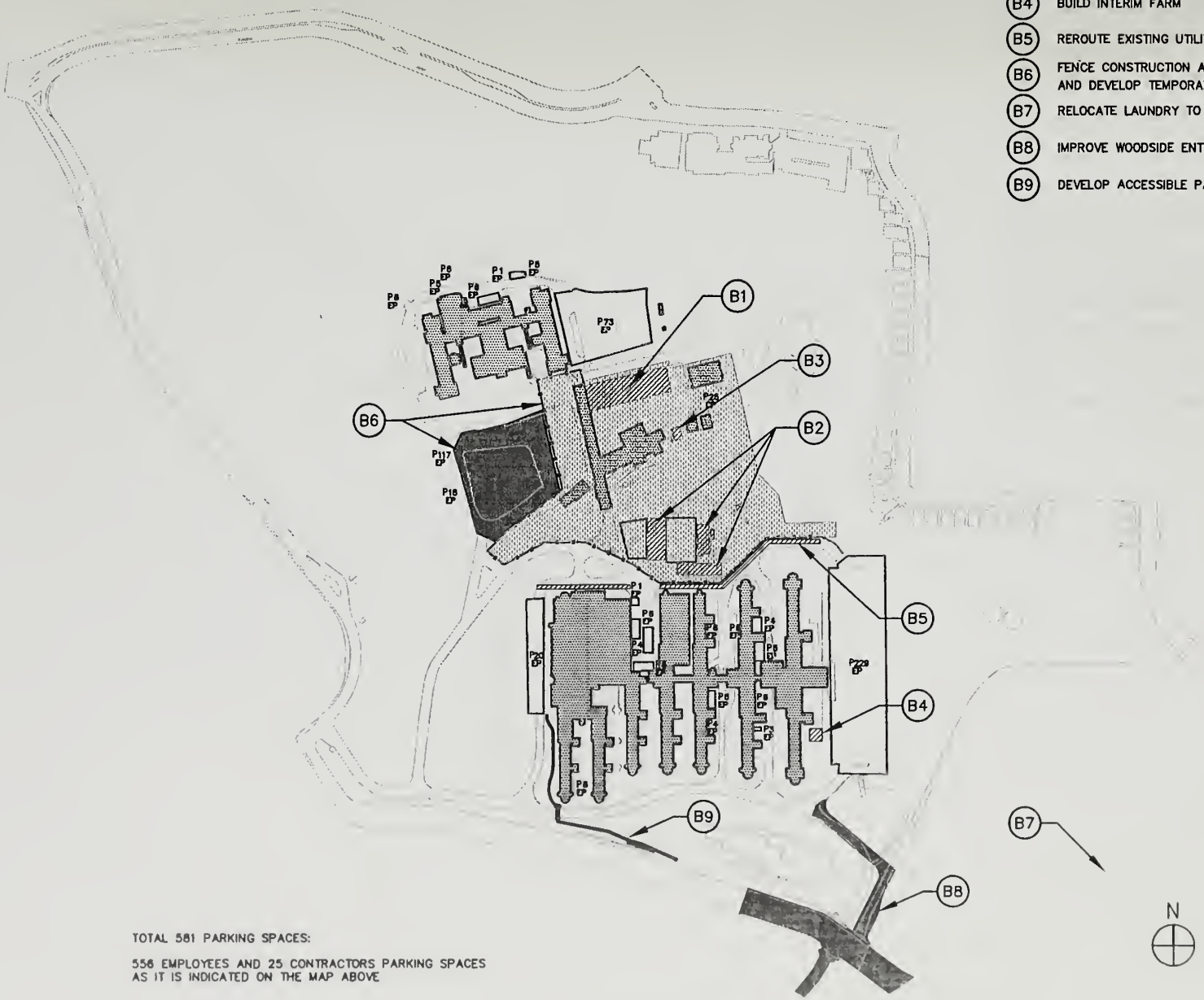
(B5) REROUTE EXISTING UTILITY LINES

(B6) FENCE CONSTRUCTION AREA, PROTECT TREES AND DEVELOP TEMPORARY PARKING

(B7) RELOCATE LAUNDRY TO OYSTER POINT BLVD.

(B8) IMPROVE WOODSIDE ENTRANCE

(B9) DEVELOP ACCESSIBLE PATH



TOTAL 581 PARKING SPACES:

556 EMPLOYEES AND 25 CONTRACTORS PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

PHASE B

ACCESS & PRE-CONSTRUCTION
APR '02 - OCT '02

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C1 BUILD NEW PERMANENT BOILER PLANT, INSTALL BOILER AND PIPING

C2 BUILD INTERIM ELECTRICAL, INSTALL GENERATOR

C3 BUILD TEMPORARY BOILER PLANT

C4 BUILD INTERIM ELECTRICAL COMPLEX

C5 INSTALL POWER CENTER EQUIPMENT CONNECT TO PG&E 12KV SERVICE

C6 INSTALL NEW GAS METER

C7 REMOVE SATELLITE DISH COMPLEX

C8 NOT USED

C9 BUILD NEW FUELING STATION & HAZ. MAT. SHED

C10 BUILD NEW UNDERGROUND FUEL STORAGE

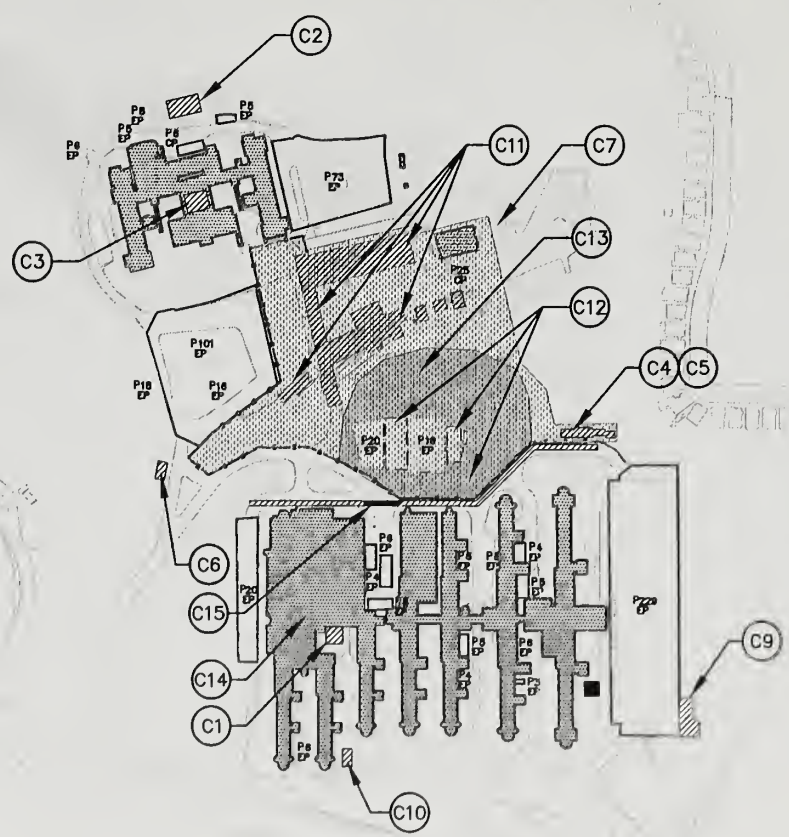
C11 ABATE LAUNDRY, PLANT, BRIDGE BUILDING AND GARAGE

C12 DEMOLISH ENGINEERING SHOPS, GREENHOUSE, FARM AND PARKING LOTS BETWEEN THEM

C13 GRADE GREENHOUSE PAD

C14 DISCONNECT FROM CENTRAL PLANT

C15 CONNECT UTILITY TRENCH



TOTAL 579 PARKING SPACES:

538 EMPLOYEES AND 41 CONTRACTORS PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

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PHASE C

GREENHOUSE PAD AND UTILITIES
NOV '02 - FEB '03

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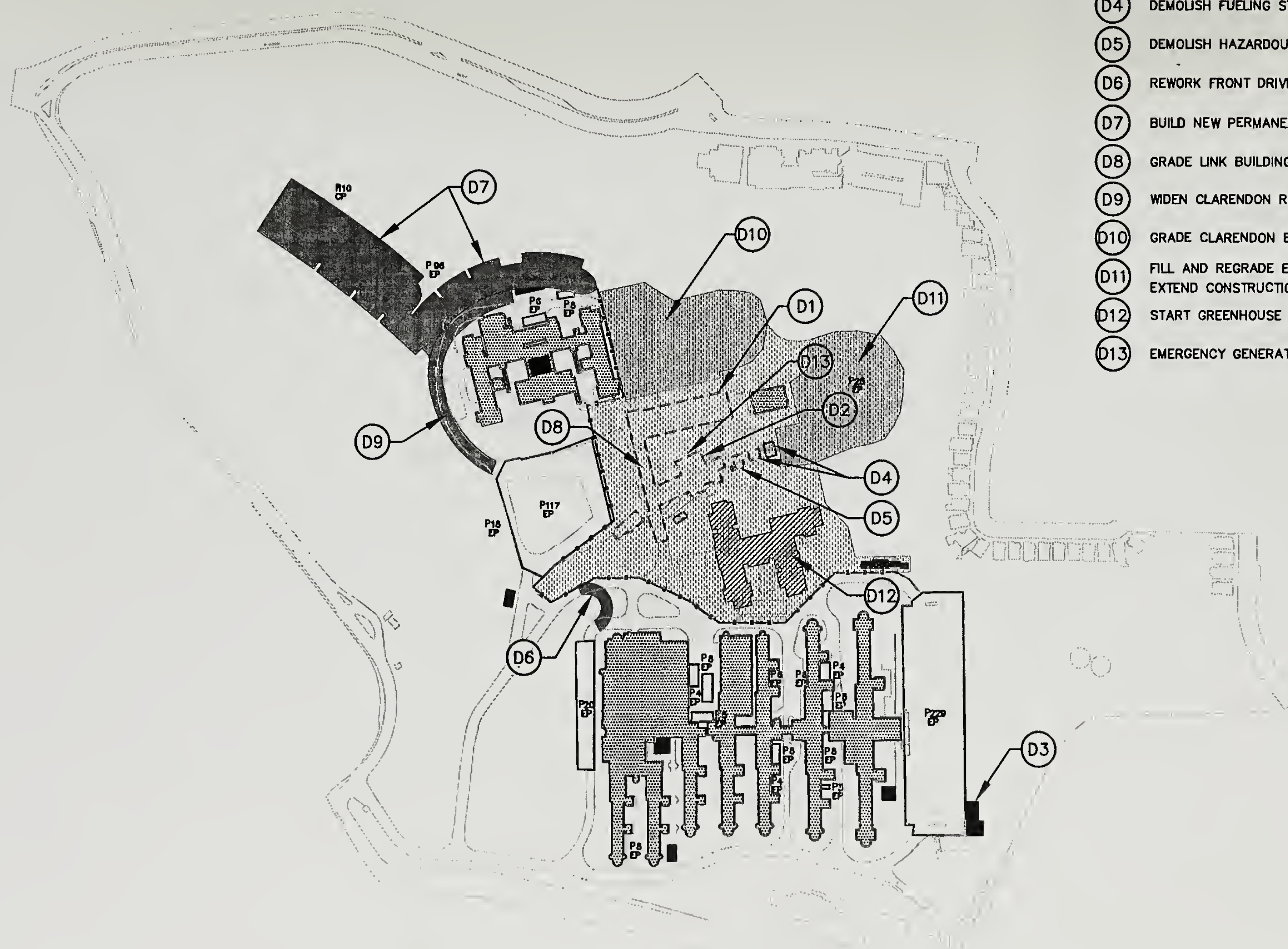

D1	DEMOLISH LAUNDRY
D2	DEMOLISH PLANT & BRIDGE BUILDINGS
D3	ACTIVATE NEW FUELING STATION & HAZ. MAT. SHED
D4	DEMOLISH FUELING STATION & PROPANE TANKS
D5	DEMOLISH HAZARDOUS MATERIALS SHED
D6	REWORK FRONT DRIVE
D7	BUILD NEW PERMANENT PARKING – 255 SPACES
D8	GRADE LINK BUILDING
D9	WIDEN CLARENDON ROAD
D10	GRADE CLARENDON EAST PAD
D11	FILL AND REGRADE EAST CLARENDON VALLEY, EXTEND CONSTRUCTION YARD AND TEMPORARY PARKING
D12	START GREENHOUSE TOWER – 3DD BEDS
D13	EMERGENCY GENERATOR FUEL TANK MODIFICATION

TOTAL 69D PARKING SPACES:

555 EMPLOYEES AND 135 CONTRACTORS PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

PHASE D

UTILITIES AND SITE PREPARATION
MAR '03 - DEC '03

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(D1) BUILD GREENHOUSE TOWER – 300 BEDS

(D2) START CLARENDON EAST BUILDING – 420 BEDS

(D3) START LINK BUILDING – 60 BEDS

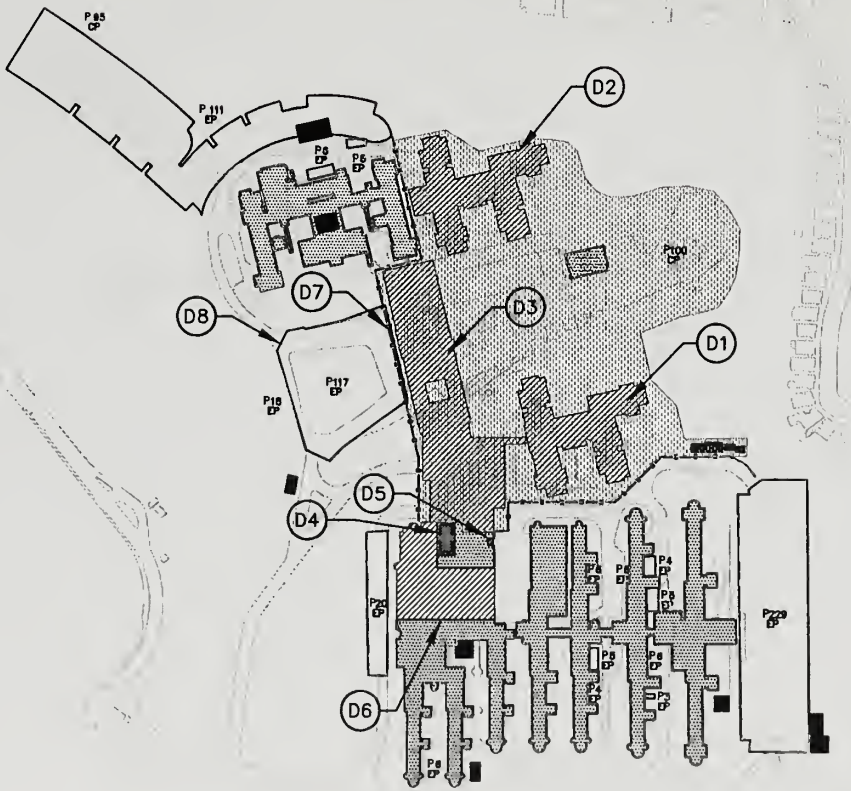
(D4) INSTITUTE INTERIM LIFE SAFETY MEASURES
DEMOLISH STAIRS, EXTEND CORRIDORS

(D5) CONSOLIDATE DIETARY DEPARTMENT
TO FREE UP SPACE

(D6) REMODEL FOR ADHC AND SNP

(D7) MOVE FENCE

(D8) CONVERT LOT TO STAFF PARKING



TOTAL 750 PARKING SPACES:

555 EMPLOYEES AND 195 CONTRACTORS PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

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PHASE E

GREENHOUSE TOWER/ EAST CLARENDON TOWER
LINK CONSTRUCTION
JAN '04 - DEC '05

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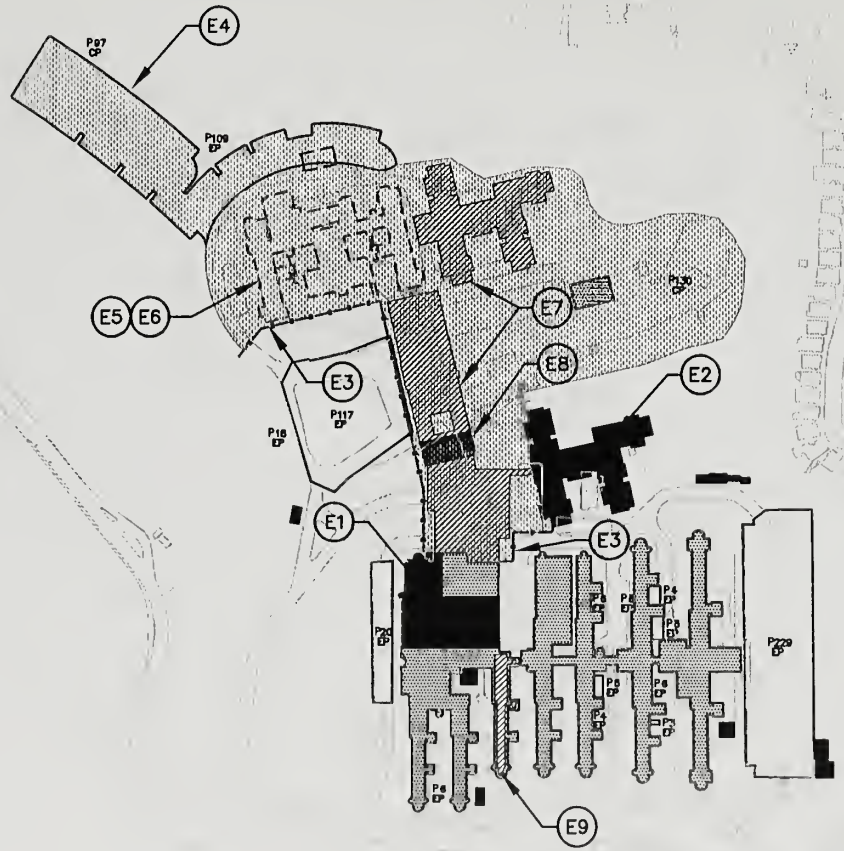

(E1) COMPLETE AND ACTIVATE ADHC & SNP

(E2) COMPLETE & ACTIVATE GREENHOUSE TOWER (+300 BEDS)

(E3) MOVE FENCE

(E4) SET UP CONSTRUCTION YARD AND DEMOLITION PLANT

(E5) VACATE CLARENDON HALL, MOVE PATIENTS TO GREENHOUSE TOWER

(E6) DEMOLISH CLARENDON HALL (−162 BEDS) ALONG WITH TEMPORARY GENERATOR & FUEL TANK

(E7) CONTINUE CLARENDON EAST & LINK BUILDINGS

(E8) COMPLETE AND ACTIVATE ELECTRICAL PLANT

(E9) VACATE C2 (−26 BEDS), MOVE PATIENTS TO GREENHOUSE TOWER

N

TOTAL 769 PARKING SPACES:

542 EMPLOYEES AND 227 CONTRACTORS PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

PHASE F

ACTIVATION OF GREENHOUSE TOWER

JAN '06 - OCT '06

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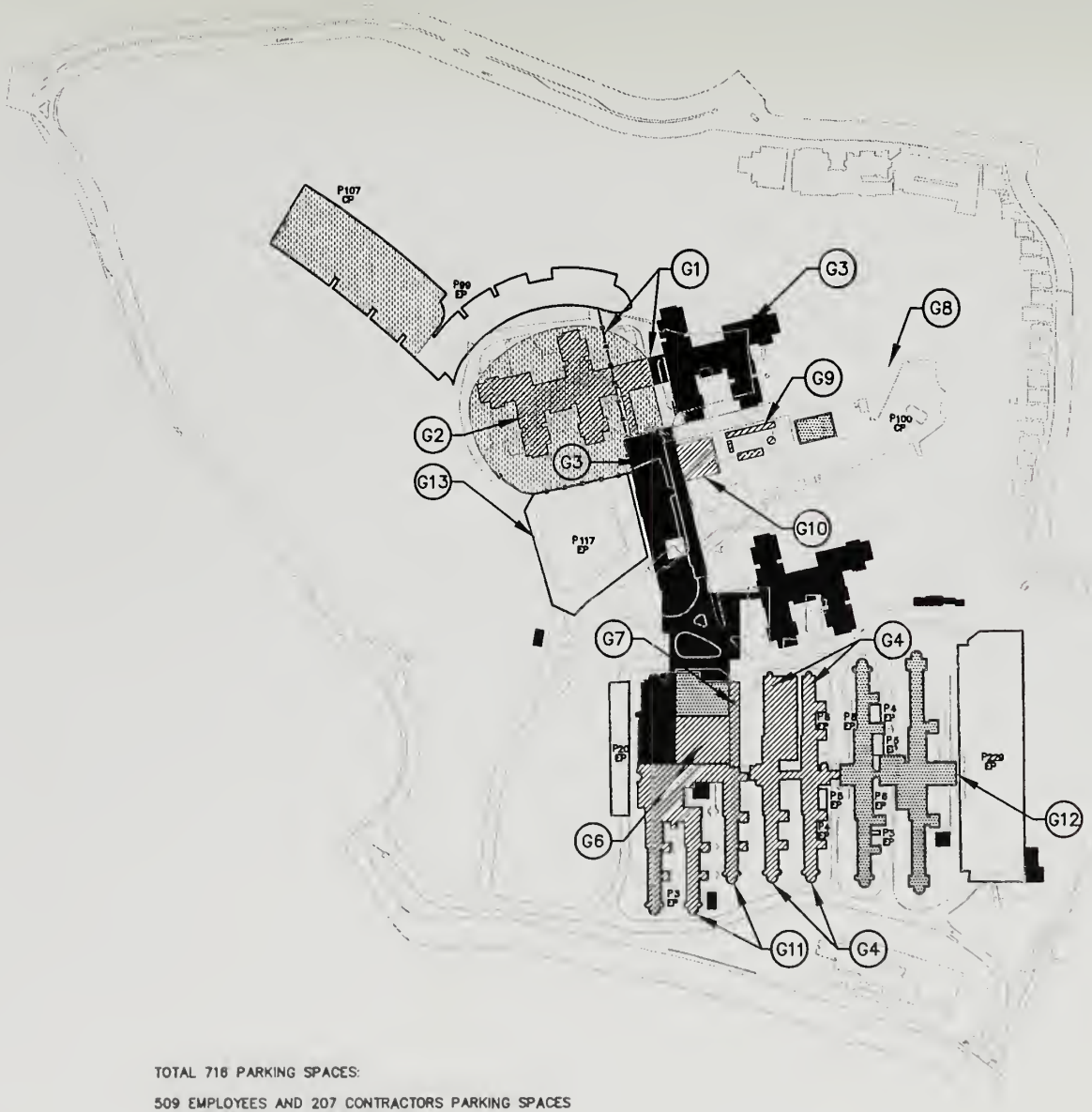

- (G1) MOVE FENCE, PROVIDE TEMPORARY VEHICULAR AND PEDESTRIAN ACCESS TO EAST CLARENDON TOWER
- (G2) START CLARENDON WEST BUILDING
- (G3) COMPLETE & ACTIVATE CLARENDON EAST (+420 BEDS) & LINK BUILDING (+60 BEDS)
- (G4) VACATE WINGS D, E, F & G (−465 BEDS) MOVE PATIENTS TO CLARENDON EAST AND LINK BUILDINGS
- (G5) NOT USED
- (G6) MODIFY MATERIALS MANAGEMENT AT H2, FOODSERVICE ADMIN. AND NURSING ADMIN. AT H3
- (G7) REGRADE TRUCK COURT AND BUILD LOADING DOCK. RELOCATE AND LOWER UTILITIES FOR FUTURE DRIVEWAY
- (G8) RELANDSCAPE EAST VALLEY
- (G9) BUILD GREENHOUSE & FARM
- (G10) START REHAB ADDITIVE ALTERNATE
- (G11) REMODEL RETAINING WARDS OF MAIN HOSPITAL BUILDING
- (G12) DEVELOP TEMPORARY SERVICE ENTRY
- (G13) RELANDSCAPE WEST VALLEY PARKING AND ENTRY

N

TOTAL 716 PARKING SPACES:

509 EMPLOYEES AND 207 CONTRACTORS PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

PHASE G

ACTIVATE EAST CLARENDON TOWER & LINK
REMODEL MAIN HOSPITAL
NOV '06 - DEC '08

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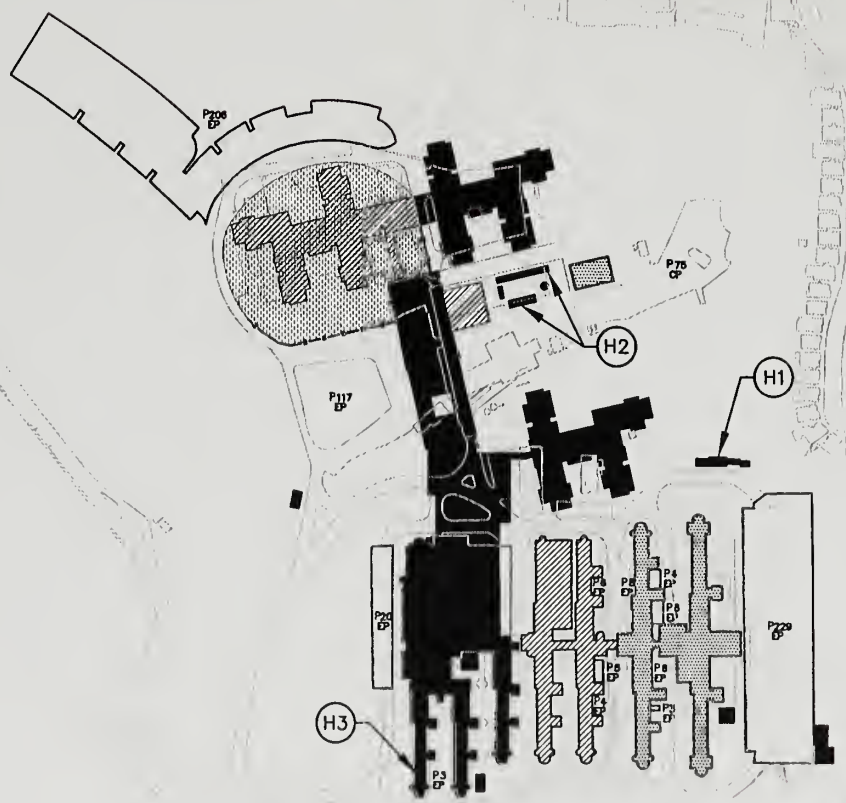
H1 DEACTIVATE EMERGENCY POWER STATION

H2 COMPLETE & ACTIVATE
FARM & GREENHOUSE BUILDINGS

H3 COMPLETE MAIN BUILDING
REMODELING PROJECTS



TOTAL 677 PARKING SPACES:

602 EMPLOYEES AND 75 CONTRACTORS PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE H

NEW ACCESS TO LOADING DOCK
FINISH REMODELING OF MAIN HOSPITAL
JAN '06 - OCT '08

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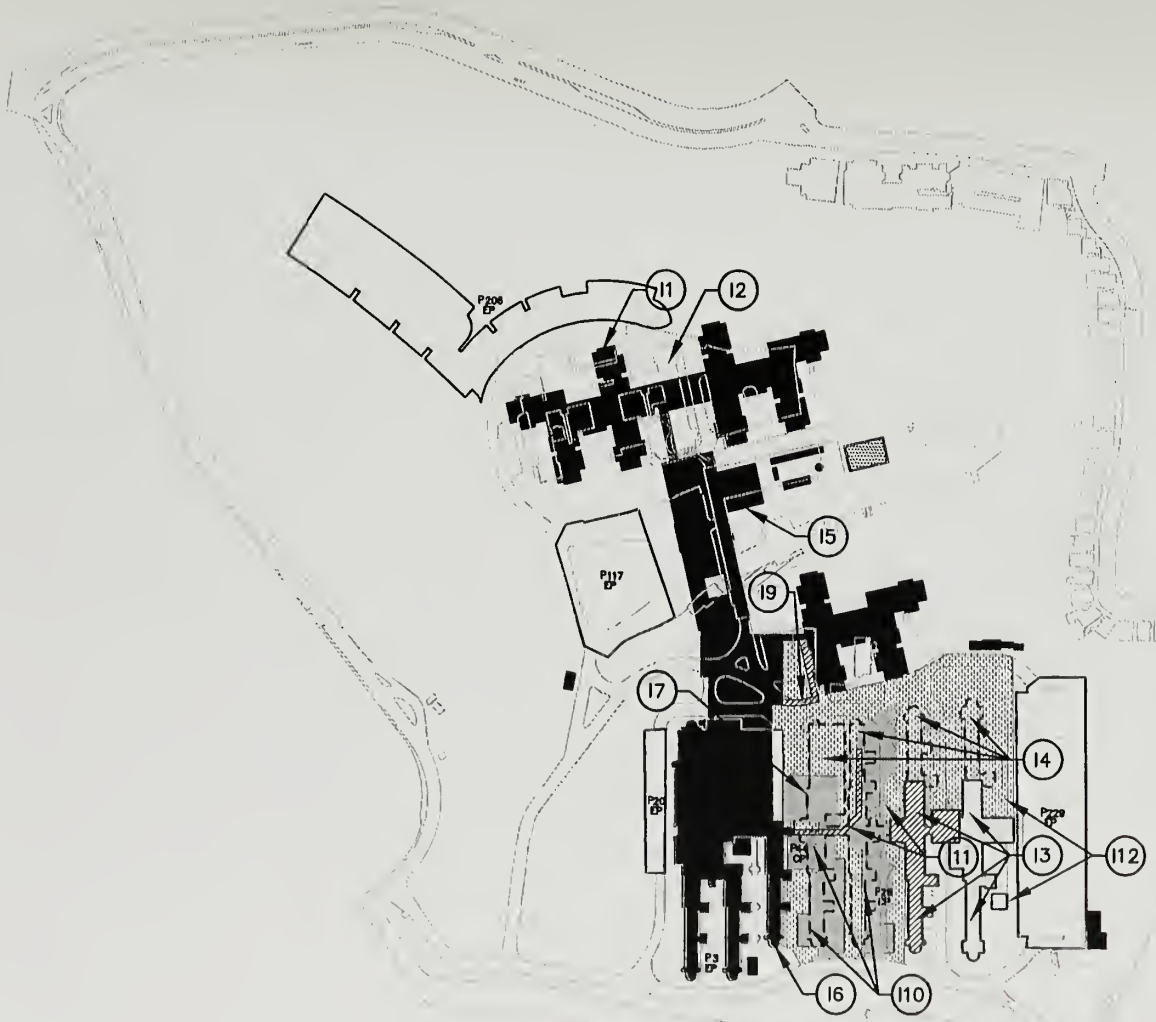

(11) COMPLETE & ACTIVATE CLARENDON WEST BUILDING (+420 BEDS)

(12) BUILD A NEW LOADING DOCK AT CLARENDON TOWERS

(13) VACATE WINGS K, L, M & O (-435 BEDS) MOVE PATIENTS TO CLARENDON TOWERS

(14) DEMOLISH WINGS D, E, G, F AND NOTHERN PORTION OF WINGS L & O

(15) COMPLETE AND ACTIVATE REHAB ADDITIVE ALTERNATE

(16) RELOCATE ENGINEERING SHOPS TO WING C2

(17) REMODEL & ACTIVATE SOUTHERN PART OF MAIN LOADING DOCK, BUILD NEW LOADING DOCK ACCESS ROAD

(18) NOT USED

(19) COMPLETE CONNECTOR BETWEEN LINK BUILDING & GREENHOUSE TOWER

(110) INCREASE QUANTITY OF PARKING SPACES BETWEEN WINGS C & K

(111) BUILD DROP-OFF ZONE AND PEDESTRIAN BRIDGE FOR FUTURE ASSISTED LIVING

(112) DEMOLISH INTERIM GREENHOUSE & FARM

TOTAL 647 PARKING SPACES:

575 EMPLOYEES AND 72 CONTRACTORS PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE I

ACTIVATE WEST CLARENDON TOWER
MAIN HOSPITAL PLAZA
OCT '08 -

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J1 COMPLETE REMODELING OF MAIN LOADING DOCK AT NORTH

J2 RECOMISSION BUILDING AS GARDENER'S HEADQUARTERS

J3 BUILD NEW EAST PARKING

J4 BUILD ASSISTED LIVING AND CHILDCARE CENTER

TOTAL 655 PAVED PARKING SPACES
AT THE CONCLUSION OF THIS PHASE
AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE J

MAIN HOSPITAL EAST
CHILDCARE CENTER/ ASSISTED LIVING

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3.0 LIST OF COMMENTORS

The following individuals submitted written comments during the public comment period of December 1, 2001 through January 16, 2002, and/or provided oral testimony at the public hearing on January 10, 2002 on the *Laguna Honda Hospital Replacement Draft EIR*.

Balestreri, John, Board of Directors, Forest Hill Association (Planning Commission public hearing comments, January 10, 2002)

Balestreri, Katie, Resident (Planning Commission public hearing comments, January 10, 2002)

Burbank, Eugene, Resident (Planning Commission public hearing comments, January 10, 2002)

Corrigan, James, Resident (written comments, January 14, 2002)

De La Mora, Gilbert, Jon Ridenour, Solange Berg, Gertrude Kin, Ernest Kohn, Anne Poirier, Timothy Poirier, Leslie Rall, Jeffrey Silverman, and George Wooding, Midtown Terrace Homeowners Association (written comments, January 12, 2002)

Fanelli, Eileen, St. John's/St. Brendan's Local Organizing Committee (Planning Commission public hearing comments, January 10, 2002)

Fanelli, Eileen, St. John's/St. Brendan's Local Organizing Committee (written comments, January 13, 2002)

Berg, Solange, Resident (Planning Commission public hearing comments, January 10, 2002)

Howard, Yvonne, Resident (written comments, January 10, 2002)

Kelley, Tim, President, Landmarks Preservation Advisory Board (written comments, January 14, 2002)

Kushner, Pinky, SPEAK (written comments, January 16, 2002)

Lambert Jr., Richard, Resident (written comments, December 11, 2001)

Lowé, James, Transit Planner, San Francisco Municipal Railway (written comments, December 11, 2001)

Moskat, Guenther, Chief, Planning and Environmental Analysis Section, Department of Toxic Substances Control (written comments, December 6, 2001)

Parrino, Richard, Member, St. John's/St. Brendan's Local Organizing Committee (Planning Commission public hearing comments, January 10, 2002)

Paul, John, Resident (Planning Commission public hearing comments, January 10, 2002)

Petoyan, Father Sarkis, Pastor, St. John Armenian Church (Planning Commission public hearing

comments, January 10, 2002)

Poirier, Anne and Timothy, Residents (written comments, December 11, 2001)

Ridgeway, Robert, Pastor, St. John's Unified Church of Christ (Planning Commission public hearing comments, January 10, 2002)

Roberts, Katherine, Board Member, Haight Ashbury Neighborhood Council (written comments, January 14, 2002)

Sapiro, Cornelia, Member, St. John's/St. Brendan's Local Organizing Committee (Planning Commission public hearing comments, January 10, 2002)

Schwartz, Davis, Treasurer, Board of Directors, Dewey Circle Beautification Project (written comments, January 10, 2002)

Strassner, Howard, Chair Transportation Committee, Sierra Club San Francisco Group (written comments, December 21, 2001)

Suacci, Steve, Member, St. John's/St. Brendan's Local Organizing Committee (Planning Commission public hearing comments, January 10, 2002)

Wald, Deborah, Resident (Planning Commission public hearing comments, January 10, 2002)

Wharton, Ann, Resident (Planning Commission public hearing comments, January 10, 2002)

Wooding, George, Resident (written comments, January 10, 2002)

Wright, Harold, Director, Forest Hill Association (written comments, January 11, 2002)

4.0 COMMENTS AND RESPONSES

This chapter contains the public comments received on the Laguna Honda Hospital Replacement Draft EIR and written responses to those comments. All substantive comments made at the Draft EIR public hearing before the Planning Commission on January 10, 2002, and received during the Draft EIR public review period from December 1, 2001 to January 16, 2002, are presented herein by direct quotation. In some cases, text has been added in brackets (e.g., "[and]") to clarify the meaning of a comment. Comments and responses are grouped by subject matter and are arranged by topic corresponding to the chapters in the Draft EIR. The subheadings in each chapter are used to further organize the comments by subtopic within the chapter. For example, if a comment was made regarding impacts of construction-related traffic, the comment is listed under the heading Transportation, Circulation, and Parking and under the subheading Construction Impacts. Comments made on the Summary chapter of the Draft EIR are placed within the chapter and/or subsection that corresponds to the individual topic. In addition, comments that do not apply to the adequacy or accuracy of the Draft EIR are presented at the end of the Chapter under the heading Other.

Comments made during the Planning Commission public hearing are identified as such. All other comments were submitted in writing. Each comment or group of comments is numbered, with responses to each of the numbered comments immediately following the comment(s). As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross-references are provided. Text changes to the Draft EIR resulting from comments are also presented in this chapter and are included as part of the responses. Text that has been added is <u>underlined</u> and text that has been deleted is shown with ~~strikethrough~~. The intent of these text changes is to clarify or amplify information already provided in the Draft EIR. The text changes do not present any new information that would alter the analysis or conclusions presented in the Draft EIR. Consequently, the text changes presented below do not trigger the need to recirculate the Draft EIR, pursuant to CEQA Guidelines §15088.5.

2.0 PROJECT DESCRIPTION

General

Comment 1

"The other thing that I would like to talk about is the fact that the project is poorly described. There are no details on the construction schedule, staging areas for construction equipment, what materials and what quantities will be used, how concrete will be brought to the site, how disabled access to and from the site will be provided, how work will be sequenced. This leaves the project element so wide open that

it is difficult to assess the project impacts." **Gene Burbank, Planning Commission public hearing comments, January 10, 2002**

"The project description provides very few details on the types and sequencing of construction activities as it relates to the potential impacts. For example, the types of materials that will be used in the new construction, especially concrete, and how concrete will be delivered to the site, what the largest anticipated pours will be and the number of trucks associated with each pour will be is not provided. The Draft EIR indicates that some construction debris will be reused but does not provide the estimated quantity relative to what will be hauled off site or disposed of (as opposed to reused) on site. This makes it very difficult to assess project impacts. The project description needs to be expanded and detailed." **Eileen Fanelli**

"p.2.0-5: 'a retaining wall of approximately 1,000 feet length...traverses the Woodside Avenue project boundary' This is the only mention of the wall in the EIR, although we understand that portions of the wall will be removed to accommodate ADA access to and from the site. Please clarify whether modification of this wall is included in the project scope and the design basis for the modifications, i.e. Improved access and project integration." **Eileen Fanelli**

"In general, it is difficult to discern from the report whether the facility will remain open to clients during this major rehabilitation effort and to what level. Perhaps a section needs to be developed that details the phasing of the project and what parts of the facility would remain open during construction." **James Lowé**

Response 1

Information pertaining to construction activities is provided on page (p.) 2.0-16 through p. 2.0-19 of the Draft EIR. This information includes the following construction details: the number of construction phases, approximate beginning and ending dates of construction, the duration of each construction phase, activities that would occur during each phase, facilities to be demolished and constructed during the different phases, the timing of when residents will be transferred to the new hospital buildings, number of temporary and permanent parking spaces and loading docks (the location of the parking lots are depicted in **Figure 2.0-4, Proposed Site Plan,** of the Draft EIR), and possible truck routes.

Page 2.0-19 of the Draft EIR under subsection **E5., Proposed Grading and Utilities Plan**, provides a description of the amount of cut and fill anticipated for the project, along with the areas to be graded and filled. **Figure 2.0-4** on p. 2.0-13 of the Draft EIR shows the construction boundary relative to the project site. Finally, the proposed hospital building elevations and the proposed construction phasing plans are included in **Appendix 2.0-2** of the Draft EIR. The proposed phasing plans show the existing facilities and parking lots, temporary support facilities and parking lots, and proposed hospital buildings, support facilities, and parking lots. The phasing plans in the appendix of the Draft EIR have been revised (see

below) due to minor inconsistencies (incorrect number of parking spaces) with the proposed site plan on p. 2.0-13 of the Draft EIR. Impacts associated with parking, noise and visual quality were determined with the above-mentioned information.

According to Section 15004(b) of the California Environmental Quality Act (CEQA) *Guidelines*, "EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." This allows for flexibility in the project design and minimizes possible costly design changes and project proponent's resistance to analyzing alternatives and including mitigation measures.

The project design is not advanced enough for the Draft EIR to provide all of the quantitative data requested by the commentor regarding construction activities. However, the information presented in the project description provides adequate information to determine project impacts.

As described in **Chapter 2.0, Project Description**, of the Draft EIR, the existing main entry at Laguna Honda Boulevard/Dewey Boulevard/Woodside Avenue and the secondary entry at Woodside Avenue would be retained under the proposed project. The existing Woodside Avenue entrance to the hospital will be shifted and reconfigured to a two-way signalized driveway as part of a separate project.

Construction workers driving small trucks and cars would access the site via the main entry. Haul trucks (i.e., concrete and semi-trucks) would access the site via the new Woodside Avenue driveway, which would provide an adequate turning radius for such large trucks. Segregation of campus access would not occur between construction vehicles, haul trucks, and staff/visitor vehicles. However, segregation of parking and internal circulation would occur.

In order to clarify vehicular access to the site during the construction period, the Draft EIR is hereby revised as follows:

> [p. 2.0-18, fourth paragraph] "~~Segregation of campus access and parking would occur between construction vehicles and staff/visitor vehicles. Construction vehicles would use the main entry, and staff and visitors would use the Woodside Avenue entrance during the majority of the construction period.~~ The Woodside Avenue driveway will be under construction beginning September 2002 until approximately June 2003. Access to the project site via the main and secondary entries would be available throughout the entire proposed project construction period and, as mentioned above, would be retained upon project completion. Although segregation of campus access would not occur between construction vehicles, haul trucks, and staff, visitor, and other cars (e.g., service vehicles), segregation of internal circulation and parking would occur. Construction worker vehicles (e.g., small trucks and cars) would use the main entry to access the site,

along with staff, visitor, and other cars. The reconfigured driveway on Woodside Avenue would provide an adequate turning radius for large trucks and thus large trucks hauling materials (e.g., concrete trucks and semi-trucks) would access the site via the Woodside Avenue driveway. Upon entering the campus, haul trucks would use designated haul routes. Construction workers would park their vehicles in Clarendon Valley and other on-site areas, away from visitor and staff parking."

Upon project completion, a ramp compliant with the Americans with Disabilities Act (ADA) would be provided from Woodside Avenue for access up to the entry driveway of the Main Hospital Building. A portion of the retaining wall along Woodside Avenue may be removed to accommodate the ramp.[1] The construction of the ramp would commence during Phase Two of the construction phasing plans. In order to clarify the construction elements of the ramp, the Draft EIR is hereby revised as follows:

[p. 1.0-3, second paragraph, new last sentence] "The project includes the construction of a ramp that will comply with the Americans with Disabilities Act (ADA). The ramp would be located from Woodside Avenue up to the entry driveway of the Main Hospital Building."

[p. 2.0-9, last paragraph, continued on p. 2.0-11] "Proposed new construction would include hospital buildings and associated support facilities, an assisted living facility, disabled access in the form of a ramp from Woodside Avenue up to the Main Hospital Building entry driveway in compliance with the Americans with Disabilities Act (ADA), and parking lots. A portion of the retaining wall along Woodside Avenue may be removed to accommodate the access ramp."

[p. 2.0-17, third paragraph, first sentence] "Phase Two would consist of constructing the new Greenhouse Building, Link Building, and Clarendon Hill East Building, and the access ramp."

[p. 2.0-19, fourth paragraph, first sentence] "Areas on the campus that would be graded include the area where the new Greenhouse Building would be built, ~~and~~ the existing Clarendon Hall East Parking Lot, and the area where the access ramp would be constructed from Woodside Avenue to the Main Hospital Building entry driveway."

Figure 2.0-4 is hereby revised to show an access ramp from Woodside Avenue to the main entrance of the Main Hospital Building (see **Figure 2.0-4, Proposed Site Plan [Revised]**).

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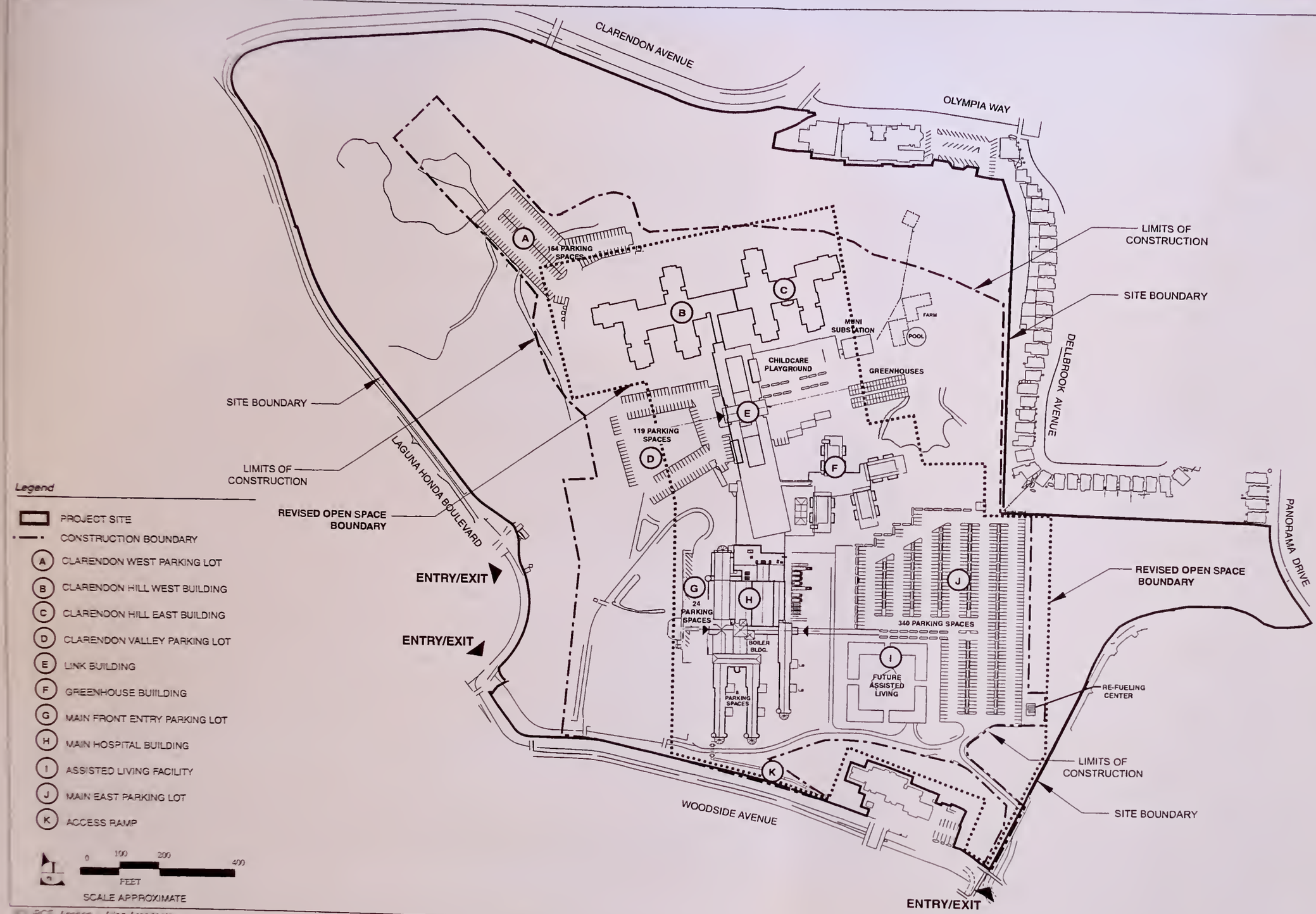
1 Because the ramp design is in its preliminary stage, the precise length of the retaining wall that may need to be removed to allow for the construction of the ramp is not known at this time. It is estimated that anywhere from 6 feet to 25 feet may be removed.



SOURCE: Anshen + Allen Architects

FIGURE **2.0-4**

Proposed Site Plan (Revised)

Draft EIR P. 2.0-13

Figure 2.0-4 of the Draft EIR shows the construction boundaries (limits of construction) for the proposed project (please refer to Section 5.0, Staff-Initiated Changes to the Draft EIR for the refined limits of construction). Portions of the open space area that are within the construction boundary generally include the undeveloped land northwest of the existing Clarendon Hall building and the areas west and east of the Clarendon Valley. As a result of construction activities, these areas would not be available for recreational use during certain phases of the construction period. However, the majority of the open space area (all areas outside of the construction boundary) would not be disturbed and these areas would be accessible during the entire construction period.

Figure 2.0-4 has been refined to include the revised open space boundary that would occur as a result of the project. As explained in the Draft EIR, the existing open space boundary, has not been clearly defined and is presented in the Draft EIR as an approximation. For this reason, a quantitative analysis can not be conducted to determine the changes in the open space boundary from implementation of the proposed project. However, given the approximate existing open space boundary and the proposed revised open space boundary it is clear that the open space boundary would not substantially change. Therefore, it is safe to assume that over 50 percent of the site area would remain in permanent open space. The Planning Department has recently determined that the project no longer requires a *General Plan* Amendment since only a minor adjustment would occur to the open space boundary and the general configuration would not change. Please refer to **Section 5.0, Staff-Initiated Changes to the Draft EIR** for a discussion on the removal of the General Plan amendment from the Draft EIR text.

In the long term, the open space area would not change substantially from its existing condition. Upon project completion, open space uses would continue to be similar to what they are now. However, differences would occur in the physical character of some portions of the open space. The proposed Clarendon West Parking Lot would be built in the northwestern portion of the project site and the Clarendon Valley Parking Lot would be reconfigured as part of the project. Both of these parking lots would be within the open space area. Although these parking lots would be paved, they are consistent with open space uses according to Sections 260(b) and 290 of the San Francisco Planning Code. In addition, please note that the satellite complex would be removed in the near future and thus is no longer proposed for installation in the southeastern portion of the campus.

As mentioned above, **Figure 2.0-4** identifies the limits of construction. All construction activities, including construction staging and placing of debris, would occur within this construction boundary. The areas outside of the construction boundary would not be disturbed by project activities during the construction period and upon project completion.

Upon project completion, access to Laguna Honda hospital and the open space area would be improved. The proposed Link Building entrance to the hospital would be two stories lower than the existing hospital entrance, making access to the hospital from the Forest Hill MUNI Station more convenient. Currently,

steps and relatively steep ramps provide access to the outdoor areas. As part of the project, these steps and ramps would be removed, and ramps designed in compliance with ADA wheelchair standards would facilitate access to the outdoor gardens. Further, the public trails within the Clarendon Valley would be expanded and would connect to the existing trail system in the open space area.

To clarify the availability of hospital services during the construction period, the Draft EIR is hereby revised as follows:

> [p. 2.0-16, new first paragraph under subsection **E4., Proposed Construction Phasing Plan**] "The proposed project would be implemented in three phases; the dates listed for each phase are approximate and are subject to change. See **Appendix 2.0** for the project's phasing plans.[6] The hospital would remain operational during all phases of construction and residents would be moved from buildings to be renovated or demolished into new or renovated buildings throughout the construction period as necessary. Clinical staff would relocate along with the residents, administrative staff would remain in the existing Main Hospital Building, and outpatient services would be relocated from the existing Clarendon Hall to a remodeled portion of the existing Main Hospital Building prior to the vacation and subsequent demolition of Clarendon Hall. The project phasing plans take this into account and have been designed to minimize movement of hospital residents."
>
> [P. 2.0-16, subsection E4(a) Phase One, first paragraph, first sentence] "~~The proposed project would be implemented in three phases; the dates listed for each phase are approximate and are subject to change. See **Appendix 2.0** for the project's phasing plans.~~"

Comment 2

"That propane refueling station as well is not addressed in any place in the EIR. And yet that is going to be there for what? Something in the neighborhood of 10 years. If you've ever seen the explosion that takes place when a propane refueling station goes up, it's not very nice. And it's going to be right on this one woman's backyard." **John Paul, Planning Commission public hearing comments, January 10, 2002**

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6 The construction phasing plans in **Appendix 2.0** correlate to the construction phasing discussed in this section and throughout the EIR as follows: Phase One is generally the same as Phases A through C; Phase Two is generally the same as Phase D; Phase Three-A is generally the same as Phases E and F; and Phase Three-B is generally the same as Phases G and H.

"The Refueling Station and underground Storage Tanks, as shown on the Site Plan (p. 2.0-13) and the Phase B plan, would be located within less than 200 feet of the closest homes on Dellbrook Avenue, and at an elevation higher than some homes on that block. The report needs to state what safeguards would be incorporated in that installation to minimize the risk of tank rupture-and consequent leakage, contamination and fire danger-in case of a major earthquake. Also, what alternative site(s), farther removed from residences, have been considered, and the reason(s) for their rejection." **Gilbert De La Mora, *et al.***

Response 2

The location of the proposed re-fueling center shown on **Figure 2.0-4, Proposed Site Plan**, of the Draft EIR is incorrect. As shown on **Figure 2.0-4, Proposed Site Plan (Revised)**, the re-fueling center would be located on the southeast corner of the Main East Parking Lot, approximately 500 feet from the property line of the nearest Dellbrook residents. The relocated re-fueling center would be about 200 feet further from the Dellbrook residents' property lines than the existing re-fueling station.

The existing location of the fueling station and propane tanks to be relocated are shown on Phase A in **Appendix 2.0-2, Project Phasing Plans**, of the Draft EIR. Currently, within the general vicinity of this area, there are three 1,000-gallon propane tanks, one 5,000-gallon gasoline underground storage tank and two 15,000-gallon diesel underground storage tanks. A Phase I Environmental Assessment, conducted by Weiss Associates (May 2000), evaluated the condition of the tanks. According to the Weiss Associates report, the above-mentioned tanks are in compliance with local, state, and federal regulations.

The tanks associated with the proposed re-fueling center would be required to comply with Chapters 6.67 and 6.7 of the California Health and Safety Code. All aboveground and underground storage tanks are required to be designed to provide at least a secondary means of containment for the entire contents of the tanks and a monitoring system to detect leaks. State regulations require daily visual inspections and annual inspections by the Regional Water Quality Control Board of the aboveground and underground storage tanks. The tanks would also be permitted and monitored by the San Francisco Fire Department.

As noted above, the new refueling station would be located about 500 feet from residents along Dellbrook Avenue, but the Draft EIR reported the distance from these residences as about 100 feet. Changes to the Draft EIR to correct the distance include:

> [p. 2.0-12, second paragraph, third sentence] "A new fueling station ~~and new satellite dish~~ would be erected on the southeastern portion of the campus at the corner of the ~~campus near~~ the Main East Parking Lot."

[p. 3.4-16, first paragraph, fifth sentence] "An interim electrical facility~~, new fueling station, and new satellite dish complex are~~ is proposed to be constructed approximately 80 to 100 feet from these residents."

[p. 3.4-16, first paragraph, last sentence] "Therefore, impacts associated with construction of the electrical facility ~~, fueling station, and satellite dish complex~~ would be considered less than significant."

[p. 3.4-21, first full paragraph, third sentence] "At these receptors, construction noise increases would be noticeable at times (increasing ambient noise levels by 5 dBA or more), but noise levels would not cause speech interference effects within adjacent residences (except during construction of the interim electrical facility ~~, new fueling station, and new satellite dish~~ in Phase One)."

In addition, **Figure 3.2-3, Proposed Parking Plan,** is hereby revised to show the correct location of the re-fueling center.

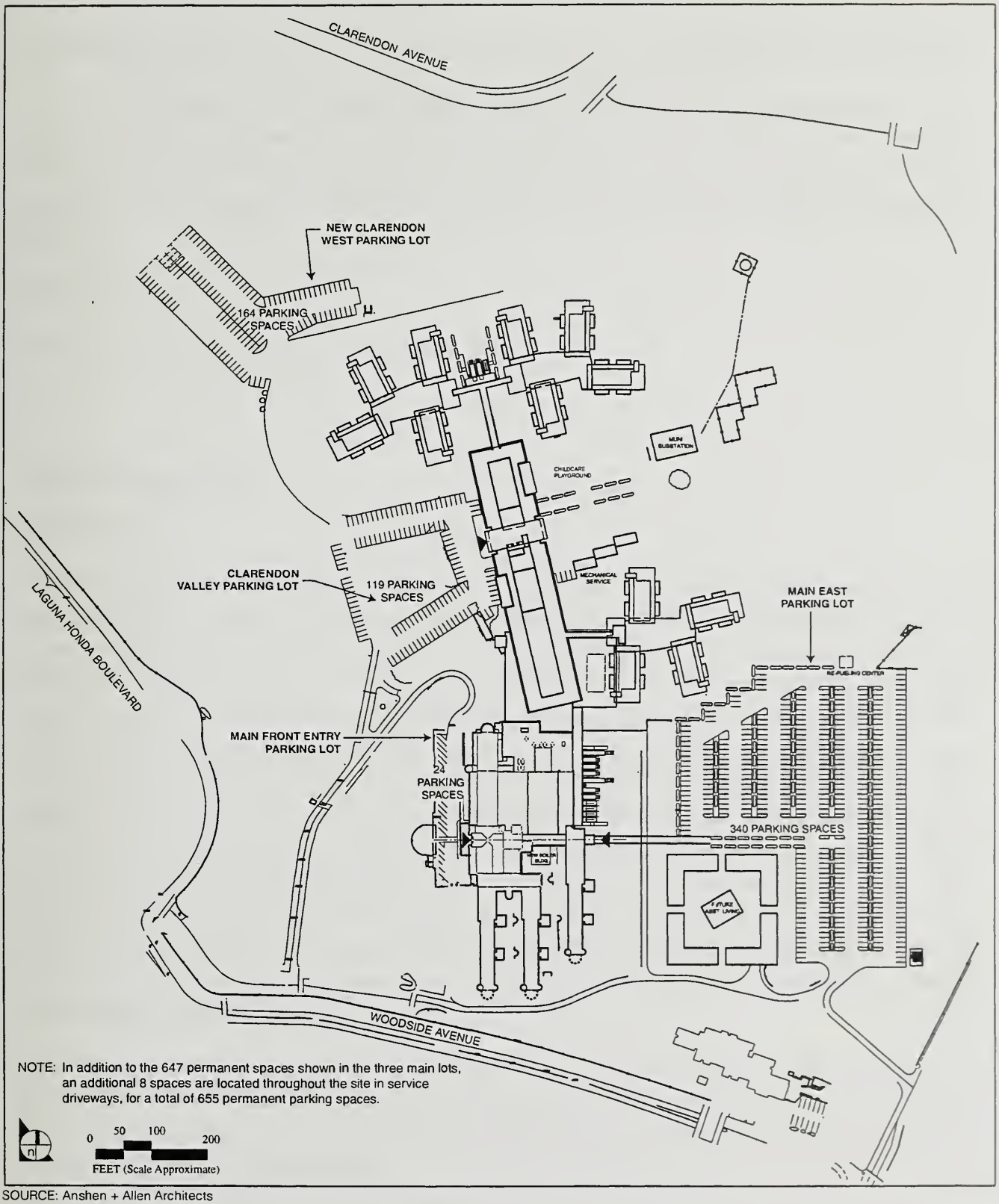
Project Objectives

Comment 3

"p. 2.0-3: Project Objectives: Why is access limited to residents to the outdoors in item 12 and what is the definition of 'outdoors?' Does it include access to the surrounding neighborhood and access for workers, visitors and volunteers to the Hospital from the neighborhood?" **Eileen Fanelli**

Response 3

The intent of the project sponsor's Objective 12, Access to Outdoors, is to ensure that design of the hospital replacement facilities allows for the provision of convenient, sheltered, and level access to the outdoors for the hospital's residents. In this case 'outdoors' refers to the hospital campus grounds. The objective is directed toward serving the hospital residents, and is one of several design criteria that were developed by the Department of Public Health through a process that included convening a National Advisory Council and visiting local and national long-term care facilities.



SOURCE: Anshen + Allen Architects

FIGURE 3.2-3

Proposed Parking Plan (Revised)

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Comment 4

"2.0 Project Description – The Landmarks Board supports the Project objectives enumerated in the Draft EIR, including the Proposed Demolition Plan outlined on p. 2.0-9. The Landmarks Board feels that, although the identified historic resources are extremely significant and worthy of protection, the more compelling need to sustain the viability of Laguna Honda in its social mission justifies their demolition." **Tim Kelley**

Response 4

The Landmarks Board's comment is acknowledged.

Project Characteristics

Comment 5

"The project scope states it is one of the -- one of its elements is the beautification of the campus. Right now you have an institution that is surrounded by walls. In some cases very large walls on Woodside. To reflect the bond measure and the concerns of the public, the project scope should state as one of its elements integration of the institutional scale of the campus with a surrounding residential scale making the area more accessible to the community and to the residents of Laguna Honda moving off the campus site and onto the surrounding community. The EIR never mentions integration of the project with the surrounding community. The EIR only mentions beautification when it addresses the view of Twin Peaks Park. It fails to mention integration and beautification as it relates to improved access. Specifically the EIR does not address the 16 – six to 17 foot concrete graffiti wall along Woodside or the four-foot concrete wall along Laguna Honda, although these two features are physical and psychological barriers to the access to the hospital and to the main streets surrounding the hospital. The failure to address site access as a primary method of integrating this project with the surrounding community is a glaring omission of the EIR, and this omission should be corrected." **Gene Burbank, Planning Commission public hearing comments, January 10, 2002**

"p. 2.0-8: 'Project Characteristics, # 7: beautification of campus features visible to neighboring areas.' All the vantage points considered are from higher elevations only. Why? If modifications to the wall along Woodside are included to improve access and construct ADA access, why wasn't wall evaluated relative to this project objective?" **Eileen Fanelli**

"The project description in particular is incomplete. It must include integration of institutional scale of the project with the residential scale of the surrounding community. This key project projection was

required to meet the bond commitment of improved access and to remove the physical and psychological barrier between the hospital and the neighborhood." **Eileen Fanelli, Planning Commission public hearing comments, January 10, 2002**

"p. 1.0-3: A4 Proposed Project: The project elements should include improvements to access as outlined in the Bond measures. Access should be reflected in the integration of the institutional scale of the project with the surrounding residential scale of the neighborhood, Item 7, beautification of campus features visible to neighboring areas, is not discussed or defined in the following description of the project. What project elements address item 7?" **Eileen Fanelli**

Response 5

According to Proposition A, the "project" to replace Laguna Honda Hospital as authorized by the bond measure is defined as the following:

> "...without limitation, all works, property and structures necessary or convenient for the acquisition, improvement, construction and/or reconstruction of a new health care, assisted living and/or other type of continuing care facility or facilities to replace Laguna Honda Hospital, including without limitation, infrastructure or other improvements in the areas appurtenant to, or which provide access to, such new facility or facilities."

Proposition A does not include language regarding improved access nor does it say anything about the integration of the scale of the campus with that of the neighborhood.

Thus, Proposition A does not require that the hospital replacement project improve access to the community or reduce the scale of the campus structures. However, as explained in the Draft EIR, one of the sponsor's objectives, Objective 20, Aesthetics, is to enhance the visual quality of the campus at the site boundaries. This objective is reflected in the proposed project design, which includes landscaping the main entrance to the hospital and along the pedestrian entry from the MUNI stop, among other visual enhancements. In addition, the project includes improvements that would increase access to open space and to the surrounding neighborhood (see **Response 1**, above).

The following discussion is hereby added to the Draft EIR to clarify the project elements associated with the beautification of the campus.

> [p. 2.0-19, new subsection following the last paragraph of subsection E5.]
>
> "E6. Proposed Landscaping
>
> The project includes landscaping of Clarendon Valley, parking and infrastructure, and other areas within the campus. Reforestation and other landscaping activities would begin at the earliest feasible construction phase. As part of the reforestation and

landscaping effort, drought-tolerant native and Mediterranean trees and shrubs would be planted. The east and west areas of the Clarendon knoll would be planted with replacement trees that would increase the diversity of trees relative to existing conditions.

The areas immediately surrounding the new building complexes would be landscaped with woodland, meadow, and lawn vegetation. A landscape buffer would be planted along the east side of the Clarendon Hill West and East Buildings to help screen the views of these buildings from the neighborhood to the east of the project site. Following construction, road edges would be landscaped and any exposed slopes on the campus would be stabilized.

As shown on **Figure 2.0-4**, the proposed greenhouse and farm would be located in the northeastern portion of Clarendon Valley. The landscaping plan includes the construction of an improved greenhouse and farm area. In addition, an orchard (including picnic tables) and an approximately 1,200-square-foot garden area would be developed east of the proposed Link Building. Hospital residents would be able to engage in gardening activities in the new garden area. The greenhouse and farm would be accessible to the disabled. Planters would be provided on a raised platform, and gardening activities would be located in a flat area. Both the greenhouse and farm area would be located in a secure meadow.

The greenhouse, farm, and orchard would be used by staff, hospital residents, visitors, and volunteers. The public would have access to these areas during normal business hours.

The existing greenhouse and farm would be temporarily relocated during Phase One of the construction period. The new greenhouse, farm, residents' garden, and orchard would be constructed during Phase Three-A.

The main entrance to the hospital, along with the pedestrian entry from the MUNI stop, would be landscaped. The underbrush along both the main entrance and pedestrian path would be removed to improve the visual character of the area."

A minor portion of the existing wall may be removed to facilitate the proposed access ramp, but the majority or all of the wall would remain as it is now. The Draft EIR analysis focuses on the changes resulting from implementation of the proposed project, not aspects of existing conditions that would not change. It is not within the scope of the EIR to consider whether the project could be better designed. The retaining wall is an existing physical feature of the project site, and while it might be considered a negative feature by some, the improvement of this condition is not required under CEQA.

Comment 6

"The Proposed Site Plan (**Figure 2.0-4**, p. 2.0-13) shows, at the (south) eastern panhandle of the site, a northerly bulge extending into the private properties of #s 1154, 160, and 166 Dellbrook Avenue, and #s 201 through 227 Panorama Drive. Unless such a transfer to properties has taken place or is planned, this apparent drafting error needs to be corrected." **Gilbert De La Mora, *et al.***

Response 6

The project site boundary as shown on **Figure 2.0-4** is incorrect in the area noted by the commentor. As shown, the project boundary on the eastern portion of the campus should not extend to the north into the residential homes on Dellbrook Avenue. Please refer to **Figure 2.0-4 (Revised)** to view the correct project site boundaries.

Comment 7

"There must be a detailed description of the project construction elements including ADA access and material stations and concrete work and work sequencing in a manner that we can evaluate its impacts, along with the cumulative impacts which are not really addressed for the adjacent YGC construction project." **Eileen Fanelli, Planning Commission public hearing comments, January 10, 2002**

Response 7

For a response to the first part of this comment, please refer to **Response 1** above. Please see **Response 50** below for a discussion of cumulative impacts related to the overlap of other construction projects with the proposed project.

Proposed Demolition

Comment 8

"The Sustainability Plan of the City and County of San Francisco promotes the use of deconstruction rather than demolition. We ask that the EIR include plans for deconstruction of all the buildings proposed for demolition." **Pinky Kushner**

Response 8

The Board of Supervisors approved the Sustainability Plan (Plan) for the City and County of San Francisco in July 1997. Establishing sustainable development is the fundamental goal of this municipal public policy. The Plan comprises broad, social goals, which are five-year objectives to achieve a sustainable society. The Board of Supervisors has not committed the City to perform all the actions outlined in the Plan. Rather, the Plan serves as guidance for further development and public comment.

It is unclear what the commentor means by the word "deconstruction." The Plan's use of the word "deconstruction" is in the context of solid waste recycling under the topic Solid Waste, one of fifteen topics presented in the Plan. The primary goals and objectives under the Solid Waste category relative to the proposed project address the use of resource-efficient building practices in the City and County of San Francisco, specifically to encourage salvage, recycling, and reuse of construction demolition material.

The project includes resource-efficient building practices by incorporating recycling requirements and salvage and reuse practices. To comply with the ordinance, the project would adhere to San Francisco's Resource Efficient Building Ordinance. The contractor (for the proposed project) would conduct a Reuse/Recycle Assessment to: 1) identify materials that are feasible for salvage; 2) provide sufficient time in the schedule for implementation of the salvage component; and 3) determine the requirements for handling and transporting to a salvage facility.

Proposed Construction and Renovation

Comment 9

"The size of the satellite dishes currently located just east of the MUNI substation (**Appendix 2.0-2**, Phase B diagram) is such (see above mentioned photograph) that when relocated (**Section E4(a)**, p. 2.0-16) to their new site in the (south-) eastern part of the campus near the water tanks (**Figure 2.0-4**, p. 2.0-13) they are likely to create a visual impact for a number of homes on Dellbrook Avenue and/or Panorama Drive.

That impact needs to be evaluated. If found to be significant and adverse, its mitigation – or a less intrusive alternate location – will need to be specified." **Gilbert De La Mora, *et al.***

"An alternate plan for the placement of the large satellite complex by the water tanks behind the 100 block of Dellbrook should be considered. Midtown Terrace has the highest concentration of antennas in the city, and this site would increase this negative visibility and necessitate a thinning of the forest buffer." **Anne and Timothy Poirier**

"The Draft EIR is misleading the public as to the true nature and function of the satellite dish complex. The satellite dish complex is owned by AT&T. AT&T has a contractual arrangement with the City of San Francisco to have their satellite dishes placed on Laguna Honda property. In essence, AT&T is a tenant and San Francisco/Laguna Honda Hospital is the landlord. On p. 2.0-9, **Section E2** of the Draft EIR states the following:

> 'Proposed new construction would include hospital buildings and associated support facilities, an assisted living facility, and parking lots. The new hospital buildings would consist of the Greenhouse Building, Clarendon Hill West, Clarendon Hill East, and the Link Building. The associated support facilities would include a boiler and power plant, an underground fuel storage tank, a fueling station, a satellite dish, and loading docks.'

The EIR is telling the public that the satellite dish complex is a necessary support facility for Laguna Honda Hospital. In the language of the EIR the satellite dish complex is as vital to the operation of Laguna Honda Hospital as power plants, boilers and loading docks. In truth, the satellite complex does not provide any operating support to the functioning of Laguna Honda Hospital. The current three (3) satellite dishes at Laguna Honda Hospital are 'Television Receive Only' (TVRD) satellite dishes. TVRD satellite dishes only receive signals; they do not broadcast signals. I would like the EIR to 1) reflect the true nature of the relationship between AT&T and Laguna Honda Hospital and 2) state that the satellite dish complex is separate and unique from the operation of Laguna Honda Hospital.

Although the draft EIR does mention the current three TVRD satellite dishes, it does not describe what equipment will be placed at the new location. The EIR should sate specifically 1) what communication equipment will be placed at the new site, 2) the dimensions of any new or old antennas or satellite dishes and 3) what, if any, new communication equipment might or could be added under the current terms of the agreement between AT&T and the city of San Francisco.

Section 3.3 of the EIR titled 'Visual Quality' focuses on visual changes in the context of alteration or obstruction of scenic views from public areas, tree removal, and the introduction and change of light sources. The EIR examines the impact of the proposed hospital design and goes to great lengths to show that the new design will have a small or limited impact on local viewpoints. The EIR does not study, examine or mention the impact of placing three forty-foot high satellite dishes on the top of a ridge overlooking a neighborhood. These three satellite dishes will have a great impact on 'visual quality' as they loom over the Midtown Terrace neighborhood. I would like the EIR to examine the 'visual quality and sight lines' of the planned relocation site for the satellite dish complex. This study should be conducted before the site is relocated.

Laguna Honda Hospitals 'open space' should not be decreased for a non-essential facility such as the satellite dish complex. As can be seen on **Figure 2.0-4**, the proposed site plan, the satellite dish complex will compromise approximately 3 - 4% of the projects existing open space. The reduction of Laguna

Honda open space would be unnecessary if the project would simply relocate the satellite dish complex to a new location either on or off of the Laguna Honda Hospital site.

The EIR should state the impact of the satellite dish complex as it relates to open space and explain why the public should sacrifice so much open space for a non-essential facility.

The current location of the satellite dish complex is approximately 300+ feet from Dellbrook Avenue homes. The ridge below the proposed new site location is extremely steep and may be weakened by the construction and weight of the satellite dish complex. Over the last five years, the soil above the Youth Guidance Center has been shifting and moving. Homes on Panorama Street are beginning to suffer cracks caused by these soil shifts. A study examining the strength of the Dellbrook hillside should be conducted. If the hillside is found to be impacted by the satellite dish complex, the complex should either be relocated to another site and/or the Dellbrook hillside must be reinforced." George Wooding

Response 9

As one of the commentors mentioned in the above comment, the satellite dish complex on the Laguna Honda hospital campus is owned by AT&T. The City and County of San Francisco allows AT&T to locate their satellite dishes on the campus through contractual agreements. Subsequent to publication of the Draft EIR, AT&T expressed that the satellite dishes are no longer needed, and AT&T intends to remove them from the campus by the end of 2002. The project sponsor has confirmed this with AT&T.[2] As a result of this action, the proposed project would no longer make provisions for a new satellite dish on the southeastern portion of the campus. In order to clarify the above, the Draft EIR is hereby revised as follows:

> [p. 2.0-9 second paragraph, third sentence, continued on p. 2.0-11] "The associated support facilities would include a boiler and power plant, an underground fuel storage tank, a fueling station, ~~a satellite dish,~~ and loading docks (see **Figure 2.0-4, Proposed Site Plan**)."
>
> [p. 2.0-12, second paragraph, third sentence] "A new fueling station ~~and new satellite dish~~ would be erected on the southeastern portion of the campus at the corner of the ~~campus near~~ the Main East Parking Lot."
>
> [p. 2.0-16, second paragraph, third sentence] "~~The existing satellite complex would be relocated to the eastern portion of the campus.~~"

---

2 Callow, Michael, Area Headend Manager, West Bay/AT&T Broadband, correspondence, March 21, 2002.

[p. 3.4-16, first paragraph, fifth sentence] "An interim electrical facility~~, new fueling station, and new satellite dish complex~~ are is proposed to be constructed approximately 80 to 100 feet from the property lines of these residents."

[p. 3.4-16, first paragraph, last sentence] "Therefore, impacts associated with construction of the electrical facility~~, and satellite dish complex~~ would be considered less than significant."

[p. 3.4-21, second paragraph, third sentence] "At these receptors, construction noise increases would be noticeable at times (increasing ambient noise levels by 5 dBA or more), but noise levels would not cause speech interference effects within adjacent residences (except during construction of the interim electrical facility~~, and new fueling station, and new satellite dish~~ in Phase One)."

In addition, **Figures 6.0-1, Alternative One: Site Plan and 6.0-2, Alternative Two: Site Plan** have been revised to removed the satellite dish complex from the graphics since the satellite dish complex would no longer exist on the hospital campus.

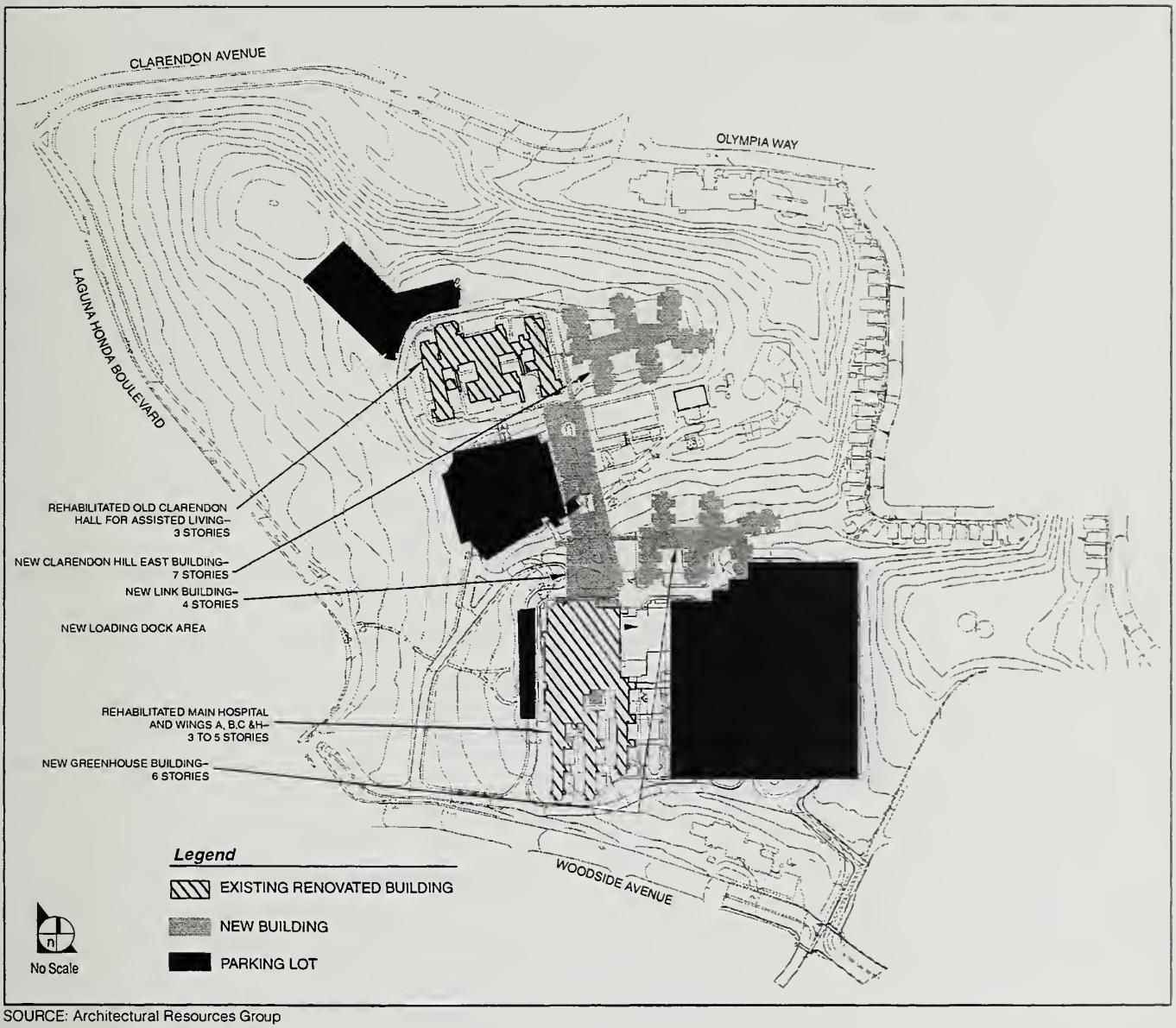
Proposed Construction Phasing Plan

Comment 10

"p. 2.0-18: 'Access Routes' Descriptions fail to note that a left-hand turn isn't possible at 7th Avenue. In addition, there is no San Jose Avenue exit from I-280 South (eastern access rte.). Monterey Blvd exit is a difficult exit to negotiate, requiring a hard right turn to reach O'Shaughnessy Blvd. Please clarify the number of vehicles, especially the types of construction vehicles that will be expected on each proposed route. In particular the length and weight of each type of vehicle should be noted relative to the radius of the turns and the potential for trucks to veer into the on-coming traffic lanes creating a safety hazard." **Eileen Fanelli**

Response 10

The commentor is correct in that a left-hand turn is not possible at 7th Avenue. Also, the Draft EIR incorrectly states that San Jose Avenue is accessible via southbound I-280. Given this, the project sponsor has re-evaluated the feasibility of the haul routes. All of the routes assume that the reconfigured two-way Woodside Avenue driveway would be available for use by the hospital. The proposed use of the Woodside driveway by Laguna Honda during construction has been agreed upon by the YGC. None of the routes would include the use of Dewey Boulevard, Claremont Avenue, or O'Shaughnessy Boulevard.



SOURCE: Architectural Resources Group

FIGURE **6.0-1**

Alternative One: Site Plan (Revised)

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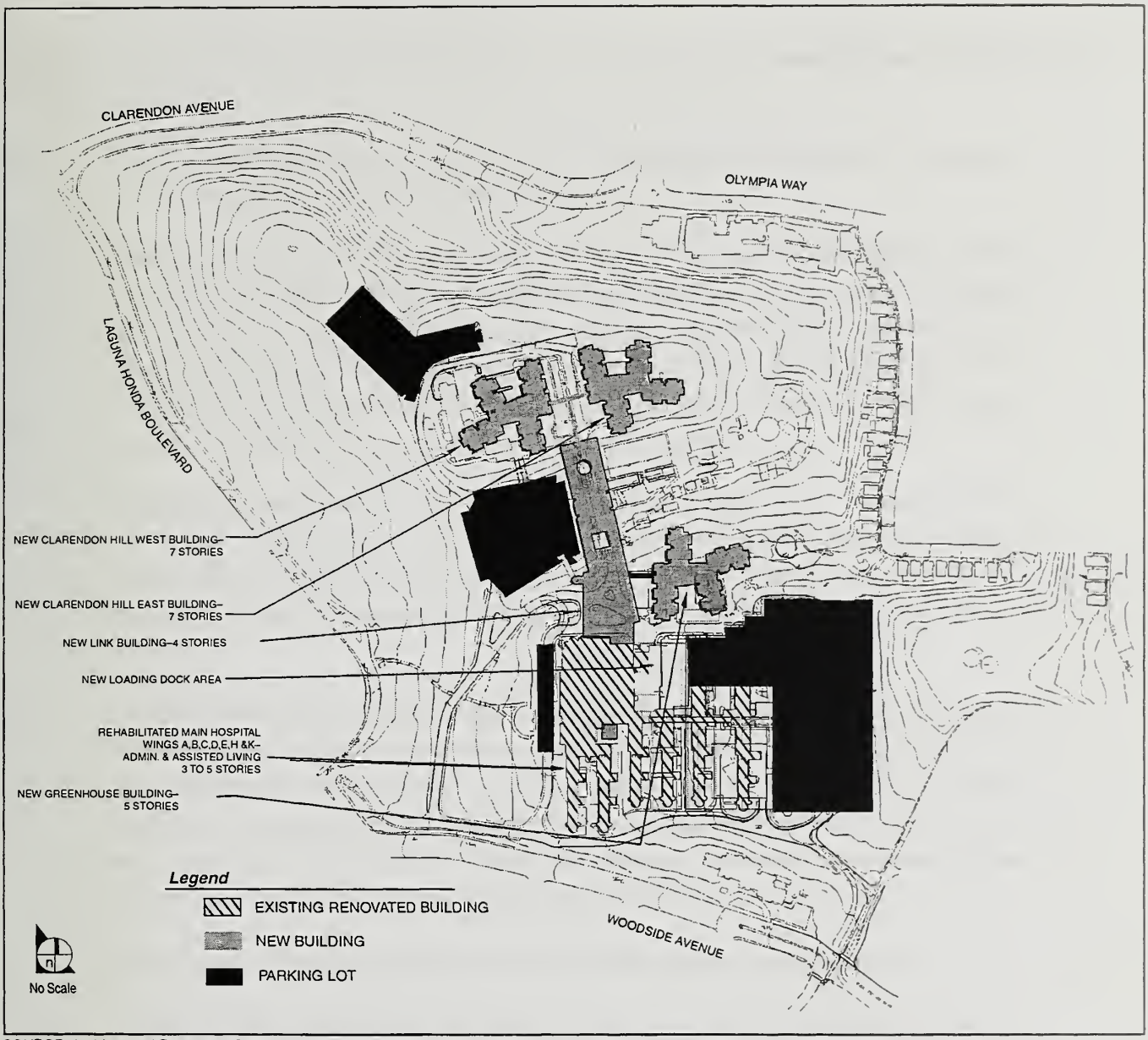

SOURCE: Architectural Resources Group

FIGURE **6.0-2**

Alternative Two: Site Plan (Revised)

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The description of truck routes in the Draft EIR is hereby revised as follows to incorporate the proposed routes:

[p. 2.0-18, fifth paragraph, through p. 2.0-19, first paragraph] ~~"Three possible truck routes have been identified and are described below.~~

~~Southern Access Route: Southern access would be via Interstate 280 (I-280). Trucks would use either the Junipero Serra exit from I-280 northbound or the San Jose Avenue exit from I-280 southbound. Trucks would follow Junipero Serra to Portola Drive to Claremont Boulevard to Dewey Boulevard to the main Laguna Honda hospital entrance. Trucks exiting Laguna Honda hospital would turn right and continue down Laguna Honda Boulevard to 7th Avenue to Lincoln Way to 19th Avenue.~~

~~Northern Access Route: Northern access would be via Highway 1. Trucks would go down Park Presidio and 19th Avenue to Taraval Street to Dewey Boulevard to the main Laguna Honda hospital entrance. Trucks exiting Laguna Honda hospital would turn right and continue down Laguna Honda Boulevard to 7th Avenue to Lincoln Way to Park Presidio.~~

~~Eastern Access Route: Eastern access would be via Interstate 80 (I-80). Trucks coming from the east would take I-280 to the San Jose Avenue exit and follow the southern access route. Alternatively, trucks may exit Fell Street and drive to Lincoln Way to 7th Avenue to Laguna Honda Boulevard to the main Laguna Honda hospital entrance. Trucks exiting Laguna Honda hospital would turn right and continue down Laguna Honda Boulevard to 7th Avenue to Lincoln Way to either Fell Street or 19th Avenue.~~

The following three truck routes have been identified for the proposed project:

Southern Access Route: Southern access would be via Interstate 280 (I-280) northbound to the 19th Avenue exit. Trucks would turn right and travel eastbound on Sloat Boulevard, then turn left to northbound Portola Drive and turn left to westbound Woodside Avenue. From Woodside Avenue, trucks would turn right into the Woodside Avenue entrance. Trucks exiting the hospital campus would turn left on eastbound Woodside Avenue, and turn right and head southbound on Portola Drive to Junipero Serra Boulevard. From Junipero Serra, trucks would turn left heading southbound on I-280. Alternatively, southbound trucks exiting the hospital campus could turn left, travel eastbound on Woodside Avenue, turn left on Portola Drive, and head eastbound to Market Street to Duboce Avenue to the South Van Ness on-ramp to Interstate 80 (I-80).

Eastern Access Route: Eastern access from the Bay Bridge would be via I-80. Trucks coming from the east would travel westbound to Duboce Avenue, turn left on Market

Street, head southbound to Portola Drive, and turn right onto westbound Woodside Avenue. Trucks would turn right and enter the hospital from the Woodside Avenue driveway. Eastbound trucks exiting the site would turn left (eastbound) onto Woodside Avenue to Portola Drive, turn left and head east to Market Street. From Market Street, trucks would turn right onto Duboce Avenue to the South Van Ness on-ramp to I-80.

Northern Access Route: Northern access would be via Highway 1 from the Golden Gate Bridge. Trucks would travel south on Presidio Boulevard to southbound 19th Avenue. From 19th Avenue, trucks would turn left (eastbound) on Sloat Boulevard to Portola Drive and turn left (westbound) to Woodside Avenue. Exiting the hospital, trucks would turn left (eastbound) on Woodside Avenue to Portola Drive, turn right on Portola Drive, head southbound to Sloat Boulevard and turn right on Sloat Boulevard to northbound 19th Avenue."

Please see **Response 48** below for a discussion of construction-related truck trips and types and sizes of construction vehicles.

Proposed Grading and Utilities Plan

Comment 11

"Now under the Proposed Rate and Utility Plan section there's a statement that says: Although cut and fills would be balanced on site, trucks would need to haul building materials to the campus. We would like to see specific restrictions on these grading operations that require on-site cycling or hauling of the cut-and-fill material within the site itself, not off the site." **Richard Parrino, Planning Commission public hearing comments, January 10, 2002**

Response 11

As stated on p. 2.0-19 of the Draft EIR, the balancing of cut and fill would occur on the site and therefore no excess fill materials would need to be hauled off-site. During the last phase of construction, there would be about 125 heavy-duty trucks scheduled over a six-week period for hauling soft demolition debris off site. Please refer to Response 48 for a discussion of construction truck delivery and haul trips to the hospital campus.

As described on p. 3.4-21 of the Draft EIR, the project would require delivery of equipment and building materials, such as steel. The project is estimated to generate an average of seven round-trip truck trips per day to a maximum peak of 15 trucks per day throughout construction for delivery of equipment and

materials. In addition, based on a conservative estimate, up to four round-trip concrete truck trips per hour (eight one-way truck trips per hour) would be generated during some days of each building construction phase.

As mentioned above in **Response 1**, the project is still in the preliminary stages of design and, although the project's conceptual design enables evaluation of the project's impacts, final grading plans have not been established. Such specifications are generally established during the final planning stages of a project.

Art Commission Review

Comment 12

"P. 2.0-22: 'Art Commission Review' How does this review include criteria for access as it relates to the ADA access planned on Woodside Avenue and the integration of the institutional scale of this project with the residential scale of the surrounding community. Please define aesthetic merit and how it applies to the view from Woodside Ave. and Laguna Honda Blvd." **Eileen Fanelli**

Response 12

According to the Art Commission staff, assessing ADA compliance is not within the jurisdiction of the Art Commission. All issues regarding review of a project's compliance with state and national ADA regulations are within the purview of the Department of Building Inspection.

The Art Commission does not have a formal requirement for criteria regarding massing and scale. The criteria used to determine the appropriate and most excellent design are subjective. A checklist or guidelines have not been established. Therefore, the design of a project would be evaluated by the Committee based on a critique and discussion of its scale and massing for accessibility, safety, and aesthetic merit.

The concept of "aesthetic merit" has many interpretations and is subjective in nature. The members of the Art Commission use their professional experience and training to assure that the public realm is enhanced with integrity. Aesthetic merit is assessed in terms of visual and pragmatic qualities. Issues of scale, volume, circulation, color, material, rhythm, transparency, and opaqueness are considered. The design's response to its context and historic precedent is also taken into consideration. Cost-effectiveness in relation to design is also considered. The concept of "aesthetic merit" is complex in general.[3]

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3 Taylor, Rommel, San Francisco Art Commission, personal communication, April 24, 2002.

The commentor's statement regarding views from Woodside Avenue and Laguna Honda Boulevard appears to be addressing the view of the retaining wall. Please refer to **Response 5** for a discussion of the Draft EIR's treatment of the retaining wall.

3.0 EXISTING CONDITIONS AND PROJECT IMPACTS

3.1 LAND USE AND PLANNING

General

Comment 13

"The Open Space (OS) height and bulk district constitutes about one half of the project area, while (building) construction is projected to be contained within the 80-D height and bulk district, the other half of the campus. However, accessibility to the outdoors is a project objective, and fire hazards are a potential impact which overlaps both districts. The two issues need to be addressed in the report." **Gilbert De La Mora, *et al.***

"The 50% open space zoning of the total 62-acre land parcel will be ignored during the multi-year redevelopment period. This is public property and citizens must maintain the right to access of 50% of the land. It is unclear whether the final project will spread outside the 50% public-access zoning area as well, which does not include private parks for Laguna Honda use only." **Anne and Timothy Poirier**

Response 13

Please see the discussion regarding "limits of construction" and the revised open space boundary in **Response 1** above. Also, please see **Response 3** above for a discussion of Objective 12, Access to Outdoors. In addition, please note that the satellite complex would be removed in the near future and thus is no longer proposed for installation in the southeastern portion of the campus (see **Response 9**).

It appears that the commentor is saying that the proposed project, under Project Objective 12, would allow more access to the open space area than currently exists. In addition, the commentor is stating that both the open space area and the developed portion of the hospital campus are fire hazard areas.

As discussed in **Response 3** above, in this case, "outdoors" in Project Objective 12 refers to the hospital campus grounds and not the open space area. Therefore, achieving Project Objective 12 would improve outdoor access in the developed areas of the campus, not necessarily providing more access to the open space area. In addition, according to the San Franicsco Fire Department, the hospital campus has not

been identified as a fire hazard area.[4] Therefore, the commentor's statement that the open space area and developed portions of the site are considered a fire hazard area is incorrect.

Furthermore, because the proposed project would not change the access to the open space area from current conditions, any potential fire hazards to people and structures in the open space area are considered an existing condition. The Draft EIR analyses focuses on the changes resulting from the proposed project, not aspects of existing conditions that would not change.

Impacts related to fire hazards were analyzed in the Initial Study (p. 40) (**Appendix 1.0** of the Draft EIR) and were determined to be less than significant. The proposed project would bring the hospital into compliance with state and federal fire safety regulations. In addition, the City and County of San Francisco ensures fire safety through the Building Code and the Fire Code. Existing buildings are required to meet standards contained in these codes, as implemented through the permit review process.

Comment 14

"Access to the open space areas needs to be retained and maintained during the construction period and, after having been enhanced (item 7, p. 2.0-8), when construction has been completed. That access to the outdoors is-primarily but not exclusively-for the use and benefit of the residents (item 12, p. 2.0-3). But it is also for that of the staff, the visitors of the residents, and the public at large. For members of the staff-the brains, lifeblood and muscle within the existing and the to-be-built structural shells-that accessibility represents an opportunity to relax, during their breaks, in communion with nature, and a respite from their at times stressful duties.

Construction activities during many project phases will disrupt or eliminate the use of or access to certain outdoor facilities such as that of the 'picnic' area northwest of Clarendon Hall during Phases C through G (6 years, 2003-2009). Therefore, general guidelines for the relocation of those facilities and for the realignment, reactivation and/or maintenance of safe trail segments need to be included in the report.

Section 101.1 of the City planning Code established eight (8) Priority Policies. One of these is the Preservation (**Section D3**, p. 3.1-8) and/or Protection (Initial Study, p. 14) of Open Space. The Proposed Construction Phasing Plan (Section E4, pp 2.0-16 through 19) specifies that crushed concrete and dirt from the buildings demolished during Phases One, Two, and Three-A would be placed at given locations within the 80-D heights and bulk district.

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[4] Schembri, Peter, Lieutenant, San Francisco Fire Department, personal communication, June 13, 2002.

That Plan also needs to specify where such broken concrete, etc. from Wings D, E, F, G, K, L, M and O, to be demolished during Phase Three-B, would be placed.

Placing such landfill debris in the Open Space area-such as the generally pristine northern part-would violate the intent and spirit of the Priority Policies. The fact that part of the north-facing hillside, north of the parking area east of Clarendon Hall, has been used as a dump site for debris, bottles, old metal furniture, tires, etc. is reason for allowing for the possibility that the reactivation of such practices may have been contemplated. This issue needs to be addressed." **Gilbert De La Mora, *et al.***

Response 14

Please see **Response 1** above for a discussion of access to the open space area during the construction period, access improvements upon project completion, and the limits of construction. No construction activities, including the placement of crushed concrete and construction staging, would occur outside the limits of construction as identified in **Figure 2.0-4**. Please refer to p. 2.0-17 of the Draft EIR, which states that crushed concrete and dirt from demolition activities would be used as fill for the temporary/permanent parking lot located northwest of Clarendon Hall. In addition, crushed material would be used for the proposed Clarendon Hill West Building and for areas within the west valley floor. The construction debris piles, including crushed concrete and other demolition material, would be temporarily placed somewhere within the construction boundary. However, these piles would be removed and used as fill as described above.

Pursuant to CEQA, the Draft EIR's project description includes a statement of the objectives of the project sponsor, including the underlying purpose of the project. Item 12 on p. 2.0-3 of the Draft EIR is a project objective. The project sponsor's intent is to facilitate outdoor access for residents through the proposed design. Although objective 12, Access to Outdoors, is focused on residents, the improvements to outdoor access, as discussed in **Response 1** above, would also benefit visitors, family members, and the public. Refer to **Response 3** regarding Objective 12, Access to Outdoors.

Comment 15

"Laguna Honda Hospital sits in a lovely gardened area with many sites of both planted and natural vegetation. These areas should be preserved as much as possible. The EIR should provide a plan of the existing garden areas on the site, along with comments on how these sites will be protected during construction phases. This analysis is especially important for the on-site natural areas, which to some uninformed persons may look like 'a bunch of weeds,' but which in reality are important fragments of our natural worlds in San Francisco. Both a botanist to identify native plants and a geologist to document any significant rocky outcrops should be consulted for this study. In accordance with the Sustainability Plan

of the City and County of San Francisco, future landscaping plans should emphasize plants native to the site." **Pinky Kushner**

Response 15

Please see **Response 5** above regarding the proposed landscaping plan, which would include native plants. The Draft EIR is only required to analyze impacts on plant and animal species that are considered a biological resource pursuant to the CEQA *Guidelines*. The existing garden areas on the project site include ornamental landscaping, consisting of non-native species, and are not considered an important biological resource.

A field survey was conducted by Impact Sciences on May 23, 2000 to identify biological resources on the project site. Based on this survey, a description of the types of trees and vegetation on the site is provided on p. 30 of the Initial Study in **Appendix 1.0** of the Draft EIR. The Initial Study (p. 31) concluded that, because areas of the site within the construction boundary do not contain native vegetation and no rare or endangered plant or animal species are expected to occur on the project site, significant impacts to biological resources would not occur.

URS Corporation prepared a geotechnical investigation for the project site in October 2000. This investigation also incorporates the results of a geotechnical investigation prepared by Woodward-Clyde Consultants in January 1982. Neither of these reports identified any significant geological features (i.e., "rocky outcrops") on the project site.

General Plan

Comment 16

"p. 3.1-7 to 3.1-8: 'General Plan Elements' How does the residence element link to the integration of the facility with the surrounding community, especially considering that the project will expand services provided at the hospital?" **Eileen Fanelli**

Response 16

The Residence Element, Objective 6, is listed on p. 3.1-7 of the Draft EIR as a *General Plan* objective that is applicable to the project. This objective is to minimize the disruption caused by expansion of institutions into residential areas. The proposed project is primarily a replacement project with some expansion of services, including the expansion of hospital beds from 1,065 to 1,200 and the expansion of the existing outpatient programs and services by 25 percent. The proposed project would be developed on an existing hospital campus and would not expand into any residential areas. No other policy or objective in the Residential Element of the *General Plan* is applicable to the proposed project. The Draft EIR analyzes

impacts associated with the proposed project, including the expansion of services, and identifies specific significant impacts. Mitigation measures are provided to reduce those impacts to a less-than-significant level.

Planned and Approved Land Uses

Comment 17

"p. 3.1-9: 'Planned and Approved Land Uses' This section mentions that no other major projects are planned in the project vicinity when there is a construction project at the corner of Woodside and Portola, the Youth Guidance Center is in the final design stages of a 3 to 4 year construction project and the San Francisco Water Department is construction improvements to the Mid-Town Terrace Reservoir. In addition, City construction of the pump station at Clarendon and Laguna Honda Blvd. was just recently completed. The Draft EIR's definition of 'major' is omitted from the discussion. The Draft EIR presumably justifies its lack of discussion on the cumulative impacts including the duration of active construction in the neighborhood, in addition to the intensity of construction, should be addressed. The Draft EIR also references the signal installation on Woodside Avenue and coordination with YGC." **Eileen Fanelli**

Response 17

The Juvenile Hall Reconstruction Project and proposed signal installation are discussed on p. 3.1-9 of the Draft EIR. The commentor is correct that the Draft EIR does not mention other planned or on-going projects in the project vicinity. The on-going and planned projects in the project vicinity have been reconsidered to determine which projects would overlap with the proposed project's schedule. One other project proposed for construction in area of the hospital campus, the Sutro Pipeline project sponsored by the S.F. Public Utilities Commission, would partially overlap the construction schedule for the proposed project. In order to correct the information about on-going and planned projects in the area, the Draft EIR is hereby revised as follows:

> [p. 3.1-9, new fourth paragraph] "In March 2002, the S.F. Public Utilities Commission will begin the third and final phase of the Sutro Reservoir and Pipeline project, which includes rehabilitation and miscellaneous improvements of the reservoir. The project is anticipated to be completed in September 2003."
>
> [p. 3.1-9, fourth full paragraph, second sentence] "~~No other major projects are proposed in the project vicinity.~~ No other on-going or planned projects in the campus vicinity would overlap with the proposed project's construction schedule."

Please see **Response 50** for a more detailed description of the combined construction effects of the YGC Juvenile Hall Reconstruction Project, the Mid-Town Terrace Reservoir, the pump station at Clarendon and Laguna Honda Boulevard, and the proposed project.

Changes in Land Use and Zoning

Comment 18

"The area proposed to be transferred from the Open Space to the 80-D height and bulk district as a result of the 'minor' adjustment of the boundary line between these two districts (per p.s 1.0-4 and 2.0-20) needs to be quantitatively defined.

Comparison of the location of the existing 80-D/OS boundary line (Existing Site Plan, p. 2.0-7) with that of the limit of Construction Boundary (Proposed Site Plan, p. 2.0-13) yields a rough estimate that this area would total about four (4) acres, or about 13% of the present OS area.

That area would be composed of about 2 acres of the proposed parking lots northwest of Clarendon Hall, about 1.5 acres at the east end of Clarendon Valley, and about 0.5 acre in the southeast panhandle, set aside for the private satellite dishes. This installation would not constitute a public necessity but would be located in a Public Use zoning district." **Gilbert De La Mora, *et al.***

Response 18

Please refer to **Response 1** for a discussion on the revised open space boundary. In addition, as discussed in **Response 9**, the satellite complex would be removed in the near future and thus is no longer proposed for installation in the southeastern portion of the campus.

Comment 19

"Also, the proposed amendments of the Zoning Map and the General Plan, by removing that acreage from the Open Space district, would appear to be in violation of Section 101-1 of the city Planning Code, specifically its Priority Policy mandating the preservation/protection of open space. But if such amendments, <u>can</u> take precedence over the Code, what are the safeguards against using them as precedents justifying future zoning revisions not just from Open Space to other districts, but from Public Use to no-public uses? This issue needs to be addressed explicitly." **Gilbert De La Mora, *et al.***

Response 19

Please refer to **Response 1** regarding the revised open space boundary. An adjustment to the open space boundary which could result in a decrease in the amount of land designated as open space on the project site would not be in violation of Section 101.1 of the Planning Code.

The commentor is referring to **Section D3., Accountable Planning Initiative,** on p. 3.1-8 of the Draft EIR which lists eight Priority Policies under Section 101.1, Master Plan Consistency and Implementation, of the San Francisco Planning Code. Priority Policy 8 refers to the "preservation of open space." (The full policy in Section 101.1(b)(8) of the Planning Code cites: "That our parks and open space and their access to sunlight and vistas be protected from development.") As stated in Section 101.1(b) of the Planning Code, and the San Francisco *General Plan* (Introduction, page iv.), Priority Policies were established to be the basis upon which inconsistencies in the *General Plan* are resolved. Priority Policies are not intended as mandates or requirements of the *General Plan*. **Section G1., *General Plan* Consistency,** on p. 3.1-12 of the Draft EIR discusses how decision makers may identify potential conflicts between the project and the *General Plan*, and how decision makers must evaluate and balance the potentially conflicting goals of different *General Plan* policies. When considering amendments to the Planning Code, including changes to the Zoning Map, the Planning Commission and the Board of Supervisors will make a determination of the project's consistency with the *General Plan*, taking into account the eight Priority Policies. Section 101.1 of the Planning Code provides a safeguard from future zoning revisions based purely on the precedent of former decisions because the Priority Policies provide a consistent basis upon which potential inconsistencies in the *General Plan* can be weighted and evaluated.

Comment 20

"The property of Laguna Honda Hospital is truly a gem. It's a gem I very much appreciate. The green space there cannot be replaced. I am deeply concerned about the impact of the construction on the green space that is there." **(Deborah Wald, Planning Commission public hearing comments, January 10, 2002)**

Response 20

Please see **Responses 1** above for a discussion of access to open space during construction and **Response 14** regarding the project objective to maintain existing and future open space.

Potential Conflicts with Plans and Policies

Comment 21

"p. 3.1-12: 'Potential Conflicts' G2. Institutional Master Plan. There is no mention of improvements to site access in the project description and how access relates to the master plan. The need for improved access relative to the master plan should be described and how the project will implement improvements, such as ADA access, and how these improvements affect the wall along Woodside Avenue should be included in the discussion." **Eileen Fanelli**

Response 21

Please see **Response 1** above for a discussion of improved access. Please also see **Response 5** regarding discussion of the retaining wall in the Draft EIR.

3.2 TRANSPORTATION, CIRCULATION, AND PARKING

Setting

Comment 22

"The Laguna Honda Boulevard-Seventh Avenue corridor, from its intersection with Woodside Avenue and Dewey Boulevard in the south, to its intersection with Lawton Avenue in the north, is the major south-to-north arterial link in central San Francisco running generally parallel to 19th Avenue in the west and Portola Drive-Market Street to the east.

Between the signalized ('Jug Handle') intersection in front of the MUNI station and the signalized intersection at Lawton Avenue, it is an eight-tenths (8/10) of a mile long, free-flowing (no signals, no stop signs) pipeline carrying high peak period traffic volumes at speeds substantially in excess of those on its contributing arterial network.

Clarendon Avenue is an arterial which serves not only as a link between southwest and north-central San Francisco, but is also the main access to the Laguna Honda corridor for most of the Midtown Terrace and Forest Knolls neighborhoods, for the Galewood and The Woods enclaves, and Clarendon School.

The arterial-to-arterial T-intersection of Clarendon Avenue with Laguna Honda Boulevard is **not** signalized. Controlled by stop signs, the westbound-to-southbound (WB-to-SB) traffic and the southbound-to-eastbound (SB-to-EB) traffic intersect with each other and with the higher speed

northbound-to-northbound (NB-to-NB) traffic on Laguna Honda Boulevard which they have to cross taking turns when gaps open up in that traffic flow.

That results in queuing in both crossing lanes during both PM and AM peak hours, ever longer delays and a major traffic hazard at the point of triple intersect.

The Traffic Engineering Division of the Department of Parking and Traffic needs to conduct a thorough analysis of detailed peak period and off-peak field surveys of this intersection with a view to improve its level of service and mitigate the traffic hazard by signalizing it.

Traffic conditions at this intersection are bound to worsen, due both to the projected yearly increase of cumulative volumes and to the projected hospital and construction traffic. As part of that analysis, a determination would need to be made as to the extent to which the envisioned mitigation is within the scope of the Laguna Honda Hospital Replacement Project or within that of the responsibilities of the Parking and Traffic Department. (See p. 4.0-1.)" **Gilbert De La Mora, *et al.***

Response 22

The Department of Parking and Traffic (DPT) is aware of the existing traffic conditions related to the Clarendon Avenue and Laguna Honda Boulevard T-intersection. Since preparation of the Draft EIR, DPT has moved forward with plans to fund signalization of this intersection in Fiscal Year (FY) 2002-2003, using funding allocated from sales tax revenues. DPT indicates that the construction costs of traffic signals have been escalating rapidly in recent years and sales tax funding is quite limited, and that sufficient sales tax revenue may not be available for these intersection improvements. If sufficient sales tax funding is not available in FY 2002-03, signalization of the Clarendon Avenue and Laguna Honda Boulevard intersection could be delayed indefinitely. (Jerry Robbins, Department of Parking and Traffic, telephone conversation and written communication, March 1, 2002). Therefore, formal analysis of signilization of the Clarendon Avenue/Laguna Honda Boulevard intersection has not been included in the traffic analysis.

With signalization, existing traffic conditions would be improved at this intersection, as well as future traffic conditions during project construction and after project completion. The signalization of the Clarendon Avenue/Laguna Honda Boulevard intersection would control traffic flows and speeds on Laguna Honda Boulevard, as well as minimize delays from vehicles attempting to make right and left turns onto Laguna Honda Boulevard.

Overall, impeded traffic conditions at the Clarendon Avenue/Laguna Honda Boulevard intersection would continue to exist, even without the proposed project. As discussed in **Section D2(b) Existing Plus Project Conditions**, and Table 3.2-2 on p. 3.2-17 and p. 3.2-18 of the Draft EIR, the worst approach of the unsignalized Clarendon Avenue/Laguna Honda Boulevard intersection operates at Level of Service C

during the PM peak hour under existing conditions and would continue to do so with the proposed project. Under cumulative traffic conditions in the year 2015, this intersection would operate at Level of Service F during the PM peak hour, which would represent unacceptable traffic delays (see **Table 3.2-3** on p. 3.2-26 of the Draft EIR). However, the project would contribute no more than four percent (15 vehicles) of overall future traffic growth at this intersection, and would not contribute any movements at the Clarendon Avenue approach.

Regional Access

Comment 23

"p. 3.2-2: 'C1. Regional Access' Monterey Blvd is mentioned as the north and southbound exits from I-280. There is no northbound exit labeled Monterey Blvd. This error needs to be corrected. If the text is referring to San Jose Ave. then the ability of construction traffic to negotiate the turns necessary to travel towards the project site must be addressed. In addition, the text mentions that trucks can turn left of Lincoln Way from 7th. This is not true. Alternative paths must therefore be identified and the impacts discussed." **Eileen Fanelli**

Response 23

The discussion in **Section C1., Regional Access**, on p. 3.2-2 Draft EIR states, "The I-280 on-ramps and off-ramps nearest to the project site are located at Monterey Boulevard." It does not state that Monterey Boulevard is the north and southbound exit from I-280.

Refer to **Response 10** concerning truck haul routes and construction traffic.

Local Access

Comment 24

"p. 3.2-3: 'Laguna Honda Blvd....from Clarendon to Dewey Blvd has unmetered parking on BOTH sides.' There is no parking permitted on one side of LH Blvd. The Draft EIR needs to correct clarify this statement." **Eileen Fanelli**

Response 24

The commentor is correct regarding on-street parking conditions on Laguna Honda Boulevard. To clarify the location of parking on Laguna Honda Boulevard between Clarendon Avenue and Dewey Boulevard, the Draft EIR is hereby revised as follows:

> [p. 3.2-3, third paragraph, fifth and sixth sentences] "Between Clarendon Avenue and Dewey Boulevard, on-street parking is not allowed in the immediate vicinity of the Forest Hill MUNI Station or on the east side of Laguna Honda Boulevard. ~~On-street parking is not permitted directly adjacent to the project site, and the sidewalks are approximately 12 feet wide.~~ Directly adjacent to the project site, on-street parking is not permitted on Laguna Honda Boulevard and the sidewalks are approximately 12 feet wide."

Comment 25

"p. 3.2-4: 'Woodside Avenue... has four-hour unmetered parking on both sides of the street.' This overstates the number of spaces as not all reaches of the street are available for parking. It also fails to incorporate YGC's plan for the use of these spaces during its construction project." **Eileen Fanelli**

Response 25

The commentor is correct regarding on-street parking conditions on Woodside Avenue. The description of parking on Woodside Avenue of the Draft EIR is hereby revised as follows:

> [p. 3.2-4, first paragraph, last sentence] "In the vicinity of the project site, Woodside Avenue has six- to nine-foot-wide sidewalks, and four-hour unmetered parking on both sides of the street, except on the west side of the street between Hernandez and Balceta Avenues."

During construction of the Juvenile Hall Replacement Project, the Youth Guidance Center (YGC) has arranged with the Department of Parking and Traffic to secure on-street parking on Woodside Avenue between Portola Drive and Laguna Honda Boulevard for use by YGC staff. Please see **Response 50** for a more detailed description of the combined construction effects of the YGC Juvenile Hall Reconstruction Project, the Mid-Town Terrace Reservoir, the pump station at Clarendon and Laguna Honda Boulevard, and the proposed project.

Comment 26

"Finally access must be addressed for patients, volunteers, workers, and the neighborhood. The EIR states that the project will not increase pedestrian/bike traffic. I believe it's on p. 1-5. But the EIR has got it wrong here. A prime project objective was to increase pedestrian/bike patient and worker access between the hospital and the neighborhood. Not only the physical hospital plans, but also the quality of the lives affected by the hospital should be improved by this project." **Eileen Fanelli, Planning Commission public hearing comments, January 10, 2002**

Response 26

Section B.2 Transportation, Circulation and Parking on p. 1.0-5 of the Draft EIR provides a summary of the more detailed transportation impact section starting on p. 3.2-1 of the Draft EIR. The commentor is referring to a sentence in the third paragraph of that summary discussion which states: "The proposed project is anticipated to result in a minimal increase in pedestrian and bicycle traffic in the vicinity of the project." This statement summarizes the bicycle and pedestrian impact discussions on p. 3.2-22 which conclude that the project would result in a minimal increase in pedestrian and bicycle traffic and, therefore, would not result in significant environmental effects on existing pedestrian or bicycle conditions. Existing pedestrian volumes and bicycle activity are relatively light in the project vicinity, partly due to the limited pedestrian access and bicycle facilities at the existing hospital campus.

The objectives of the proposed project are listed on p. 2.0-2 and p. 2.0-3 of the Draft EIR, and do not include increased pedestrian and bike access. However, the proposed project would include several elements to encourage pedestrian and bicycle access within and to the hospital campus for residents, volunteers, workers, and neighborhood residents. The two existing pedestrian entrances to the hospital would be maintained as part of the proposed project. In addition, new pedestrian pathways would provide access between the new structures, and a new pedestrian sidewalk would be added along the former Woodside Avenue driveway. The proposed project would also provide 51 bicycle parking spaces, and would be equipped with eight showers and 16 clothes lockers. The hospital has prepared a draft Transportation System Management Program (TSMP), which states that a secure, enclosed bicycle parking facility would be provided as part of the proposed project. Please see **Response 44** for a complete description of the Laguna Honda hospital TSMP.

Several of the project objectives listed on p. 2.0-2 and p. 2.0-3 of the Draft EIR would improve the quality of lives affected by the hospital by improving and expanding patient care facilities, and complying with building code requirements related to fire and life safety, disabled accessibility, and seismic safety.

Existing Intersection Operating Conditions

Comment 27

"p. 3.2-5: 'Table 3.2-1' Note #5 briefly describes Woodside entrance improvements. These improvements need to be described in the Draft EIR in detail and the impacts (or improvements) to traffic flow to and from the institutions and within the neighboring residential streets discussed." **Eileen Fanelli**

Response 27

Note 5 in **Table 3.2-1** on p. 3.2-5 of the Draft EIR is intended to provide a brief explanation of changes to the existing unsignalized Woodside Hospital access driveway. A detailed description of Woodside Avenue improvements is provided in **Section C8. Planned Improvements to Transportation Facilities** starting on p. 3.2-13 of the Draft EIR. Please see **Responses 34** and **35** for a discussion of the Woodside Avenue improvements and impacts on neighboring residential streets.

Transit Network

Comment 28

"We are concerned that the hospital's future plans do not adequately encourage the use of our public transportation. 1) We ask that the public transportation service to the site be included in a figure in the EIR." **Pinky Kushner**

Response 28

Laguna Honda hospital recently developed a Transportation System Management Program (TSMP) (February 4, 2002) to encourage the use of transit and alternative modes of transportation during project construction and after project completion. Please see **Response 44** for further discussion of the hospital's TSMP and its recommendations to encourage transit use by hospital staff and visitors.

Figure 3.2-2, Existing MUNI Transit Network in Project Vicinity, on p. 3.2-9 of the Draft EIR shows MUNI transit service to the project site, including the locations of the West Portal and Forest Hill MUNI Stations.

Comment 29

"As you may know, Muni operates a shuttle service Line 89-Laguna Honda that runs around the hospital grounds and offers service to Forest Hill Station and Laguna Honda Blvd.

Muni staff would need to meet with project sponsors to discuss interim changes and whether or not permanent changes to the route are needed." **James Lowé**

Response 29

Please see **Response 32** below regarding potential interim and permanent changes to the Line 89 Laguna Honda route, as well as meetings between MUNI staff and the project sponsor to discuss the re-routing of the Line 89.

Comment 30

"Route 89 should be discussed in **Section 4.1.2**. In addition, it is incorrectly shown in **Figure 2.2**, which implies that operation is not affected by changes to the Laguna Honda facilities." **James Lowé**

Response 30

The commentor is referring to a section and figure in the *Laguna Honda Hospital Transportation Study*. Route 89 is discussed in **Section C3. Transit Network** on p. 3.2-8 of the Draft EIR and is also shown on **Figure 3.2-2** on p. 3.2-9 of the Draft EIR. **Figure 3.2-8** of the Draft EIR (and Figure 2-2 of the *Laguna Honda Hospital Transportation Study*) both correctly show the local MUNI transit network that serves the Laguna Honda campus, including the Line 89 route. These figures were not intended to show the existing, detailed internal routing of the Line 89 within the hospital grounds; as the commentor states, that routing could be affected by the proposed project. Please see **Response 32** below regarding potential interim and permanent changes to the Line 89 Laguna Honda route, as well as meetings between MUNI staff and the project sponsor to discuss the re-routing of the Line 89.

Comment 31

"The San Francisco Municipal Railway Service Planning staff have no further comments in response to your request for review of the Draft environmental Impact Report for the Laguna Honda Hospital Replacement Project. However, our previous comments remain applicable." **James Lowé**

Response 31

Responses to previous comments by MUNI staff are provided in **Responses 1, 29, 30, and 32.**

Comment 32

"I should note that any change to our construction impacts on Line 89-Laguna Honda should be coordinated through our Street Operations/Special Events office at 554-9286." **James Lowé**

Response 32

As the commentor states, the Line 89-Laguna Honda route could be affected during project construction, and after project completion. Re-routing during construction would only occur within the hospital campus. No re-routing of the Line 89 would occur off-site. Permanent changes to the Line 89 route could also be required due to the reconfiguration of buildings and parking lots and proposed new uses on the hospital campus. To further clarify the potential changes to the Line 89-Laguna Honda route, the Draft EIR is hereby revised as follows:

> [p. 3.2-19, first paragraph (continued from the previous page), last sentence] "The project sponsor has met with MUNI to review the proposed site plan and develop future re-routing of the Line 89 within the hospital campus after project completion."

To further clarify the potential impacts on the 89-Laguna Honda route during project construction, the Draft EIR is hereby revised as follows:

> [p. 3.2-24, second full paragraph, second through sixth sentences] "The 89 line, which operates within the hospital grounds, could require interim re-routing within the hospital campus during project construction. The project sponsor has met with MUNI staff to discuss and develop plans for the temporary re-routing of the Line 89 during project construction. It is not anticipated that any ~~additional~~ off-site MUNI bus lines or stop(s) would need to be relocated during construction of the proposed project. However, if it is determined that additional temporary off-site MUNI bus lines or stop relocations would be needed, they would be coordinated with MUNI's Street Operations/Special Events office ~~division~~. During the construction period, there would be a flow of construction-related trucks into and out of the site."

On-Street Parking

Comment 33

"p. 3.2-11: 'C4(b) On Street Parking' cites Pacheco Street from Castaneda to Alton Avenues as a source of on-street parking. This is an unrealistic alternative due to topography. The assumptions in the Draft EIR need to be explained. In addition the parking analysis excludes Idora and Ulloa Avenues even though a new signal and cross walk are planned at the intersection of Idora and Ulloa. These improvements would facilitate access to the project site and encourage day parking on Idora and Ulloa as well as portions of Portola. The analysis needs to be revised to include these streets." **Eileen Fanelli**

"The parking analysis must be expanded to include Ulloa, Idora, and parts of Portola, as these will be the closest streets to the new entrance and light for access to the hospital." **Eileen Fanelli, Planning Commission public hearing comments, January 10, 2002**

"Another element: The parking study area is flawed. It includes Pacheco Street, all the way up to the 9th and Pacheco entrance to Forest Hill as a possible site for parking overflow. Anyone familiar with the topography of Forest Hill knows that no one is going to park on Pacheco and walk down to Laguna Honda. Ironically the parking study area does not include Idora or Ulloa Streets, which are directly across from the Youth Guidance Center and Laguna Honda Hospital. So I think that needs to be rethought." **Steve Suacci, Planning Commission public hearing comments, January 10, 2002**

Response 33

The discussion of on-street parking in the first paragraph on p. 3.2-11 of the Draft EIR, **Section C4(b) On-Street Parking,** describes existing parking occupancy on Pacheco Street from Casteneda to Alto Avenues, and does not discuss Pacheco Street as a source of future available parking. Despite topography, parking occupancy on Pacheco Street between Casteneda and Alto Avenues was observed at 80 percent occupancy; however, residential parking permits are not in effect on this street.

The parking study area boundaries encompass residential streets within approximately a ten-minute walk of the main entrance of the hospital building; this limit did not include Ulloa and Idora Avenues. On March 5, 2002, a field survey of on-street occupancy was conducted on Idora and Ulloa Avenue between Woodside Avenue and Laguna Honda Boulevard between 10:00 AM and 12:00 PM (the same period for which the on-street parking survey was conducted for the Draft EIR). On-street parking occupancy on Idora Avenue was approximately 40 percent, and on Ulloa Avenue approximately 80 percent. Due to its proximity to the YGC campus, it appears that Ulloa Avenue could be used more heavily by YGC staff for on-street parking. During the field survey, at least two people were observed coming from YGC to cars parked on Ulloa Avenue. Both Ulloa and Idora Avenues have residential

permit restrictions that limit non-resident parking to four hours between the hours of 7:30 AM and 3:30 PM.

A new signal and crosswalk are planned for the intersection of Idora and Woodside Avenues as part of a separate project involving improvements to the Woodside Avenue hospital and YGC access driveways (see Responses 34 and 35 for a description of these improvements). Idora and Ulloa Avenues are parallel streets and do not intersect. The Department of Parking and Traffic indicates that no signal and crosswalk improvements are proposed for the intersection of Ulloa and Woodside Avenues. As the commentor states, these improvements could encourage parking on Ulloa and Idora Avenues. However, non-resident parking on these streets is limited to four hours. Furthermore, even though pedestrian access would be improved at the Woodside entrance to the hospital campus, the hospital building, which employs the majority of workers on-site, would be farther from the Woodside Avenue entrance than under existing conditions. Therefore, the proposed improvements to this entrance would not necessarily encourage increased parking on Ulloa and Idora Avenues. Due to the distance of Portola Drive from the hospital campus, it is unlikely that the Woodside Avenue improvements would encourage hospital parking on this street. Residents of the streets located south of Woodside Avenue could petition to the Department of Parking and Traffic to change the non-resident parking limit from four to two hours, to further discourage the use of these streets by non-residents.

Planned Improvements to Transportation Facilities

Comment 34

"p. 3.2-13: 'C8. Planned Improvements..' describes the Woodside Avenue entry/exit. The description of existing conditions is inaccurate. It states drivers exiting are limited to right hand turns. They are currently not allowed to exit this location. The text states that this new entrance would become a 'major ingress and egress roadway for the hospital'. The impacts of this new exit/entrance on traffic within the neighboring residential streets are not discussed." **Eileen Fanelli**

"The traffic impacts to the neighborhood are not addressed in the report. Specifically, the projected impact of traffic flow patterns due to the new traffic signal." **Eileen Fanelli**

Response 34

The commentor is referring to a statement on p. 3.2-14 of the Draft EIR that refers to vehicles exiting the Youth Guidance Center (YGC) driveway on Woodside Avenue. That sentence does not refer to Laguna Honda hospital, as the hospital's Woodside driveway is entry-only under existing conditions. Nonetheless, the EIR text is not accurate, as vehicles exiting the existing YGC driveway are allowed to

make both right- and left-hand turns. To clarify the existing configuration and proposed improvements to Woodside Avenue driveway, **Section C8., Planned Improvements to Transportation Facilities**, the Draft EIR is hereby revised as follows:

> [p. 3.2-13, last paragraph, continued on p. 3.2-14] "The Juvenile Probation Department and Department of Public Health plan to widen the Youth Guidance Center (YGC) access road to provide a joint-use, two-way access road~~, located immediately east of and adjacent to the Laguna Honda hospital Woodside Avenue entry only driveway.~~ with Laguna Honda hospital. This is a separate project that is unrelated to the Laguna Honda Hospital Replacement project. Under existing conditions, a fence separates an entry-only Woodside driveway to the Laguna Honda hospital campus from the YGC Woodside driveway, which is exit-only. The planned joint-use, two-way access road will be located immediately adjacent to the existing Laguna Honda hospital entry-only driveway. ~~These improvements will be coordinated with the YGC Juvenile Hall Reconstruction Project. (Refer to Section 3.1, Land Use and Planning, Subsection E., Planned and Approved Land Uses for a description of the YGC Juvenile Hall Reconstruction Project.)~~[9] From Woodside Avenue, one entry lane and two exit lanes will be provided, thereby reducing the afternoon peak back-up at Laguna Honda Boulevard, particularly during shift changes. A new traffic signal will be installed at the Woodside Avenue intersection, ~~and will be tied to the existing signal at Woodside Avenue and Hernandez Street,~~ allowing left and right turns when exiting both facilities. The signal will be timed with the existing signal at Woodside Avenue and Hernandez Street, so that traffic flows on Woodside Avenue are not impeded by additional stops. The signal intersection of Idora Street with the Laguna Honda/YGC driveway will be deliberately offset. Left and right turns could be made from each facility, but a new concrete median will be installed to prohibit direct traffic across the intersection.
>
> When these improvements are completed, the Woodside Avenue entrance will provide a major ingress and egress roadway for the hospital. ~~These improvements are expected to commence in Spring 2002 and be completed by Fall 2002.~~These improvements are expected to be completed by Fall 2002, and are unrelated to the projects planned for Laguna Honda hospital and the Juvenile Hall facility on the YGC campus. (Refer to

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~~9 Improving Woodside Avenue access has been a Laguna Honda hospital objective long before the replacement project was formulated. Surveys show that at least 30 percent of existing staff leaving the existing main parking lot want to go east on Woodside Avenue. If they could use a two way signalized driveway to Woodside Avenue it would reduce afternoon congestion at the only existing exit to Laguna Honda Boulevard. Since the YGC was planning to widen their driveway as part of the Juvenile Hall Reconstruction Project, Laguna Honda hospital decided to make it a joint project with the YGC.~~

Section 3.1, Land Use and Planning, Subsection E., Planned and Approved Land Uses for a description of the YGC Juvenile Hall Reconstruction Project.)[9] Upon completion of the Woodside entry improvements, ~~Exiting~~ exiting workers from both the YGC and Laguna Honda hospital facilities would ~~now~~ then be able to make left-turn and right-turn movements. ~~Currently, vehicles exiting the Woodside driveway are restricted to right-turns-only.~~ The Woodside ~~Drive~~ Avenue improvements and signalization would also help alleviate on-site congestion and delays on Laguna Honda Boulevard during the shift change time periods, particularly the peak afternoon shift change."

The improved Woodside Avenue roadway will become a major ingress and egress roadway because it will provide a major signal controlled ingress/egress that will provide an alternate egress for hospital staff who currently exit from the main hospital entrance at Laguna Honda Boulevard/Dewey Boulevard/Woodside Avenue. During the PM peak period and afternoon shift change, the improvement will relieve on-site back-ups as well as traffic congestion on Laguna Honda Boulevard at the Laguna Honda Boulevard/Dewey Boulevard/Woodside Avenue main entry. At least 30 percent of existing staff want to go east on Woodside Avenue after leaving the existing main parking lot exit on Laguna Honda Boulevard. With the Woodside Avenue improvements, fewer vehicles would travel eastbound on Laguna Honda Boulevard east of Dewey Boulevard, thereby decreasing traffic congestion and delays for vehicles making right and left turns from and onto residential streets south of Dewey Boulevard. The Woodside Avenue improvements will not increase traffic on residential streets, as vehicles using this exit will be discouraged from using residential streets for outbound destinations (because eastbound vehicles would be prohibited from crossing Woodside to access Ulloa Avenue), and westbound vehicles are more likely to continue on Woodside Avenue to Laguna Honda Boulevard.

Section D2(b) Existing Plus Project Conditions beginning on p. 3.2-17 of the Draft EIR evaluates traffic conditions in the hospital vicinity assuming the signalization, widening, and two-way reconfiguration of the Woodside Avenue driveway are in place, since these improvements are scheduled to be completed by Summer 2003. Traffic conditions (as measured by changes in the average delay per vehicle) would slightly improve as a result of vehicles able to use the Woodside Avenue improvements.

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9 Improving Woodside Avenue access has been a Laguna Honda hospital objective long before the replacement project was formulated. Surveys show that at least 30 percent of existing staff leaving the existing main parking lot want to go east on Woodside Avenue. If they could use a two-way signalized driveway to Woodside Avenue it would reduce afternoon congestion at the only existing exit to Laguna Honda Boulevard. Since the YGC was planning to widen their driveway as part of the Juvenile Hall Reconstruction Project, Laguna Honda hospital decided to make it a joint project with the YGC.

Comment 35

"My concerns are how the Draft EIR does not effectively deal with traffic issues. Specifically the proposed traffic signal at a driveway which will serve both Laguna Honda and the Youth Guidance Center at the intersection of Idora and Woodside. The EIR does not describe the proposed signal, traffic lanes, street medians, and the impact on the neighborhood. It does not explain how the new light will alleviate severe traffic backups during peak periods at Laguna Honda Hospital. It does not explain how the signal will prevent backups onto Woodside nor on adjacent residential streets. Traffic headed east on Woodside toward Portola already backs up. The proposed signals at Idora and the one on Hernandez will increase the backups and force still more cars to turn onto Balceta and Hernandez to gain access to Laguna Honda Boulevard and streets to the south. These streets are narrow and have many children living on them. There is no description in the Draft EIR of significant or meaningful deterrents to the use of these streets to gain access to Laguna Honda. There is also no clear explanation of how the new driveway and signal at Idora and Woodside will prevent cars that are exiting the driveway from crossing Woodside and using Idora to also cross over to Laguna Honda Boulevard. Our concern is that the EIR must address these major traffic issues before the construction of the new signal and driveway on Woodside at Idora." **Cornelia Sapiro, Planning Commission public hearing comments, January 10, 2002**

Response 35

Planned Woodside Avenue driveway improvements, including signalization, traffic lanes, and street medians, are described above in **Response 34**. The Woodside Avenue improvements are unrelated to the proposed project. **Response 34** also discusses the effects of these improvements on traffic in the nearby neighborhood. The signalization of Woodside Avenue will help prevent backups on Woodside Avenue by allowing eastbound vehicles from both the YGC and Laguna Honda campuses to make left turns with a controlled signal cycle, instead of negotiating left turns across Woodside Avenue when gaps open up in the traffic flow. Such existing movements cause delays in east- and westbound traffic on Woodside Avenue. The planned signal at the Woodside driveway will be synchronized and timed with the existing signal at Hernandez Avenue so that traffic flows on Woodside will not be impeded by additional stops and cause back-ups. Cars will be prevented from exiting the driveway and crossing Woodside and using Idora to cross over to Laguna Honda Boulevard by a new concrete median that would be installed to prohibit direct traffic across the intersection. The intersection of Idora Street with the Laguna Honda/YGC driveway has been designed to be deliberately offset to prohibit such through movements to Idora Avenue.

Improving Woodside Avenue access has been an objective of Laguna Honda hospital long before the replacement project was formulated. Surveys show that at least 30 percent of existing staff leaving the existing main parking lot head east on Woodside Avenue. The two-way signalized driveway to Woodside Avenue will reduce afternoon congestion at the only existing exit to Laguna Honda Boulevard,

which also affects traffic flows at the Dewey Boulevard intersection and the jug-handle turn-around opposite the Forest Hill MUNI Station. When YGC planned to widen its driveway as part of the Juvenile Hall Reconstruction Project, the hospital decided to make it a joint project with the YGC, which would improve traffic conditions at both facilities and in the vicinity.

Project Travel Demand Analysis

Comment 36

"Implicit in the trip distribution percentages enumerated on p. 3.2-17, 18.6% of the work trips and 28.5% of the visitors' trips generated by the project would be to/from the north. They would therefore contribute to the cumulative omnidirectional traffic demand at the Clarendon/Laguna Honda intersection which per **Section D2(c)**, p. 3.2-26 would operate poorly.

During the peak hours, when the northbound signal at the MUNI ('Jug Handle') intersection is on green, there are **no** safe gaps in that traffic flow, and queues form and lengthen at the two stop sign-controlled crossing lanes at the Clarendon/Laguna Honda intersection. Towards the end of the AM peak period, that congestion is aggravated by traffic due to parents returning from taking their children to Clarendon School.

The unsafest condition develops after the northbound 'Jug Handle' signal turns to amber. There will be a few stragglers, one or two buses from the 'Jug Handle' bypass, and a few cars coming out from Plaza Street. Gaps of various lengths develop, but they will be too few since the red cycle is shorter than the green. Traffic from the queued-up lanes will take their turns, or be hesitant or aggressive about it, sometimes coming to a stop close the fast through lane. Only half of the queue may get across before the next green platoon arrives, and the queues will lengthen. During school days and under high employment conditions, delays (in the westbound-to-southbound movement) of two minutes or more are not unusual.

The consultant's traffic study appears to have been made prior to January 2001 when construction of the pump plant and the water mains caused realignments, repaving and unusual traffic conditions on Laguna Honda Boulevard. Field surveys of the Clarendon/Laguna Honda intersection, if conducted during that construction period, may well have produced atypical results." **Gilbert De La Mora, *et al.***

Response 36

As discussed in **Response 22**, the DPT is aware of the traffic and safety conditions related to the stop-controlled intersection of Clarendon Avenue and Laguna Honda Boulevard. DPT currently has plans to signalize this intersection, beginning in Fiscal Year 2002-2003.

The commentor is referring to the Clarendon Pump Station and Related Pipelines project, which involved the installation of a 36-inch diameter pipeline on Laguna Honda Boulevard between Clarendon Avenue and Dewey Boulevard. This project was constructed and completed between June 2000 and August 2001.[4] The Transportation, Circulation and Parking chapter of the Draft EIR is based on the Laguna Honda Hospital Transportation Study (Final Report, February 2001). Intersection counts, parking surveys and field observations were conducted for the Background Transportation Study in April and May of 2000, prior to construction of the Clarendon Pump Station project. Therefore, the study surveys and findings and Draft EIR analyses were not affected by temporary traffic conditions related to the Clarendon Pump Station project.

Traffic Impacts

Comment 37

"And my concerns today are twofold, and they are more omissions than a problem with the environmental report per se. The first has to do with traffic. The areas of the report that deal with traffic tend to focus on parking, which is important to all of us in the triangle community between Woodside and Laguna Honda and the greater Forest Hill extension area. But there is also a question of traffic changes, traffic pattern changes, that are going to be caused by the projected light and the increased traffic. The report talks about traffic not being materially changed because the parking spaces and the number of people and so forth. It omits the number of construction workers and the truck traffic that's moving back and forth. The point I would like to make about the traffic changes is that this whole area has very small streets. It's family oriented. There are children and schools in the area. And the way it happens now, for example on Dewey Drive, when traffic begins to back up because of a light change or the volume of traffic, the cars move onto Merced and move through there at a very high rate of speed. We are afraid that lights changing in the Woodside area are also going to cause that same type of traffic to divert through the area. And that really hasn't been addressed in the environmental impact report."
Gene Burbank, Planning Commission public hearing comments, January 10, 2002

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4 Adams, Marcy, Public Involvement Coordinator, PUC City Distribution Division, telephone conversations, March 1 and 6, 2002.

Response 37

As the commentor states, traffic could be diverted onto residential streets if there are substantial back-ups on Woodside Avenue or Laguna Honda Boulevard. The separately planned signalization, widening, and two-way configuration of the Woodside Avenue entrance at Idora Avenue will slightly improve back-up conditions at the Dewey Boulevard/Laguna Honda Boulevard intersection, as fewer cars will exit the hospital from the main driveway at that location. The signalization of the Woodside Avenue driveway intersection will help prevent backups on Woodside Avenue by allowing eastbound vehicles from both the YGC and Laguna Honda campuses to make left turns with a controlled signal cycle, instead of having to make left turns across Woodside when gaps open up in the traffic flow as currently exists. Such movements cause delays in east- and west-bound traffic on Woodside Avenue. Should back-ups occur at the signalized Woodside Avenue intersection, they would occur on-site due to vehicles queuing to wait for left-turn signal changes.

Please see **Response 48** concerning the number of construction workers and truck traffic associated with the proposed project.

Comment 38

"p. 1.0-5: B2 Transportation, Circulation, and Parking: The Draft EIR states that the project will result in a worsening of operation conditions at specific intersections. What are the subsequent impacts to air quality? How was the increased traffic percentage of 3% to 4% determined at these intersections and what is the basis for asserting that this level of increase is not a significant impact?" **Eileen Fanelli**

Response 38

Pages 3.2-26 and 3.2-27 of the Draft EIR discuss the project's impacts under 2015 cumulative operating conditions. For purposes of environmental review, the Planning Department conducts a project-specific, detailed analysis to determine if a project's contribution to future traffic growth could potentially have a significant impact on intersection operations under cumulative conditions. This analysis also takes into account a project's contribution to vehicle movements, which would worsen intersection operations under future cumulative traffic conditions. Based on this analysis, the Planning Department determined that all but two intersections would operate at LOS C or better, and at these two intersections the proposed project would not make a significant contribution to cumulative impacts.

At the Clarendon Avenue/Laguna Honda Boulevard intersection, operating conditions would worsen from LOS C to LOS F, as a result of making left turns from Clarendon Avenue onto Laguna Honda Boulevard. The project would contribute four percent of the traffic volumes that would worsen

operations at the Clarendon Avenue/Laguna Honda Boulevard intersection. The percentage figure is based on the number of vehicles that the project would contribute to the total number of vehicle turning movements that cause a decrease from LOS C to LOS F at this intersection. While the proposed project's traffic contribution would contribute 4 percent of the cumulative PM peak hour volumes at this intersection, it would not contribute any new vehicles during the PM peak hour at the Clarendon Avenue approach. Therefore, it was determined that the project's contribution to cumulative traffic impacts at this intersection would be less than significant.

Under cumulative operating conditions, the signalized Woodside/O'Shaughnessy/Portola intersection would worsen from LOS D to LOS E. However, the proposed project would contribute 29 vehicles during the PM peak hour, which is less than 4 percent of cumulative PM peak hour volumes at this intersection. As discussed in the preceding paragraph, this percentage represents the number of vehicles that the project would contribute to the total number of vehicle turning movements that worsen operating conditions at this intersection. More importantly, the proposed project would make the greatest contributions to left-turn and through movements from Woodside Avenue and westbound right turns from Portola Drive, both of which would continue to operate satisfactorily for future cumulative conditions. The proposed project would contribute no more than two vehicles to any of the specific movements that would operate poorly and cause this intersection to operate at LOS E under cumulative conditions. Therefore, the project would not make a significant contribution to cumulative traffic impacts at this intersection.

Air quality impacts associated with an increase in vehicular traffic from the proposed project were assessed in the Initial Study, **Appendix 1.0** of the Draft EIR. As stated in the Initial Study, the Bay Area Air Quality Management District (BAAQMD) recommends that carbon monoxide (CO) modeling be conducted for projects that would affect intersections operating at level of service (LOS) D, E, or F, or would cause a decline to LOS D, E, or F. As stated above, under cumulative operating conditions, the signalized Woodside/O'Shaughnessy/Portola intersection would worsen from LOS D to LOS E. Under cumulative operating conditions, the westbound approach at the unsignalized intersection of Clarendon Avenue/Laguna Honda Boulevard would worsen from LOS C to LOS F. Modeling was performed for the Woodside/O'Shaughnessy'Portola intersection, and it was determined that the traffic generated at this intersection would not result in exceedances of the State 1-hour or 8-hour CO standards. While no modeling was performed for the Clarendon Avenue/Laguna Honda Boulevard intersection, the traffic volumes at the intersection would be substantially less than traffic volumes at the Woodside/O'Shaughnessy/Portola intersection. As with traffic at the Woodside/O'Shaughnessy/Portola intersection, traffic generated at the intersection of Clarendon Avenue/Laguna Honda Boulevard would not exceed the State 1-hour or 8-hour CO standards. Therefore, impacts related to CO emissions would be less than significant.

Comment 39

"But we believe that the failure to include these issues of access and the trafficking in our neighborhood in this draft EIR is not only a betrayal of the promises we received from the City at this meeting, but also a flaw in the report which should be corrected simply on the basis of the norms of responsible planning." **Roger Ridgway, Planning Commission public hearing comments, January 10, 2002**

Response 39

Transportation, circulation, and parking impacts of the proposed project are discussed in Chapter 3.2 of the Draft EIR. The impact analysis begins on p. 3.2-14 of the Draft EIR. In addition, **Responses 22** through **50** augment the transportation impact analysis presented in the Draft EIR.

Parking Impacts

Comment 40

"p. 3.2-1/2/3/4: 'Transportation, Circulation, and Parking. Summary' The project would result in an unmet parking demand..., which could be partially accommodated on-site and on adjacent major arterials.' The Draft EIR needs to specifically identify which streets it is identifying as parking. If it is Woodside, the Draft EIR must address the fact that the YGC has already taken these places for its 3 to 4 year construction project." **Eileen Fanelli**

"p. 3.2-19: 'Parking Impacts' refers to 'increased parking on arterials'. Where is this parking available (i.e. where is parking under utilized?)? How does the residential permit program protect the neighborhood from parking impacts? What is the specific criteria used to determine that there will be no significant impact to neighbors considering both the duration of the construction project and the magnitude of the unmet parking need? Why if the Draft EIR reaches the conclusion of no impact does it earlier reference the need for remote parking? Why specifically, is the project unable to accommodate all project and operational parking on site through use of permanent and temporary parking areas?" **Eileen Fanelli**

"And the elements that I'd like to address today particularly involve the transportation, circulation, and parking elements of the EIR and the impact of the construction project on neighborhood parking. Specifically the EIR states that unmet parking demand can be met partially on site and also in part on neighborhood arterials. Specifically Woodside Avenue, Laguna Honda Boulevard, and Clarendon Avenue. Woodside Avenue right now has parking on portions of it, some of which is now going to be reserved by the Youth Guidance for their construction or once that project starts. So that arterial will become essentially useless. Other parts of it do not have any parking on it, specifically because they are

traffic lanes. So it's really a misnomer to say there's available parking on the nearby arterial of Woodside. On Laguna Honda Boulevard there is some parking down by the Forest Hill Christian Church, although parking on the north side of the street has been taken away. The City, after they completed the pump station for the reservoir, they put in a bicycle lane. So that is also gone. On Clarendon Avenue there is space for overflow parking, but it is rather limited when you look at the number of spaces that may be needed by workers as well as staff who currently use some of the Woodside Avenue parking. That's going to be taken away. It's by YGC." **Steve Suacci, Planning Commission public hearing comments, January 10, 2002**

Response 40

The total proposed parking supply of 655 spaces represents a net increase of 52 spaces over the existing 603 parking spaces. As discussed in the second paragraph in the Parking Impacts section beginning on page 3.2-19 of the Draft EIR, the proposed project would generate a net new parking demand of 76 spaces, resulting in a parking shortfall of 58 spaces, which constitutes less than 10 percent of the spaces that would be provided on site. The unmet demand includes the parking demand of the assisted living facility (21 spaces) which would be built sometime after 2010. A shortfall of this size is quite likely overstated when considering the following conservative factors that were used to develop the parking demand and the parking shortfall estimate for the Draft EIR.

1. As discussed in **Appendix 3.2, Trip Generation – Main Hospital,** of the Draft EIR, parking demand for the proposed hospital was derived from the number of vehicle trips associated with the percentage increase in the number of proposed hospital beds (1,200 beds) relative to the existing number of hospital beds (1,065 beds). (Parking demand for the assisted living facility was estimated separately based on an analysis of a similar facility.) The parking demand for the hospital is based on the trip generation of the hospital. Trip generation was determined by pro-rating the number of existing trips associated with the existing Main Hospital. This methodology was approved in consultation with the Planning Department when the background Transportation Study was conducted for the project. The existing trips were based on actual number of trips counted entering and existing the project site during the PM peak hour. The rate of increase assumed that the overall bed count incorporated related visitor, employee and service trips. The trip generation analysis did not use employees as the basis of trip generation; therefore, it is not possible to correlate parking demand directly to the number of employees.

   The proposed project would result in about a 12.7 percent increase in the number of beds, as compared to a 4.4 percent net increase (66 employees) in the total number of employees, including the assisted living facility (see discussion in the third full paragraph on p. 2.0-12 in **Section 2.0, Project Description,** of the Draft EIR). Therefore, the trip generation and parking demand analyses assumed

a much higher percentage increase in trips for the project than the estimated net increase in employment. As a result, the Draft EIR overstates parking demand of the hospital employees.

2. As stated in the third paragraph of the Parking Impacts discussion on page 3.2-19 of the Draft EIR, the estimated shortfall does not account for parking spaces that would be made available by the existing 47 laundry workers who would be relocated to an off-site facility. These workers currently use approximately 30 of the existing parking spaces onsite. (Although the number of parking spaces utilized by laundry workers cannot be precisely separated from the parking used by other existing hospital workers, a rough estimate was made based on the trip generation methodology used to estimate parking demand for the new assisted living workers on site.)

3. Additional parking could be made available by re-designating non-employee parking, which is underutilized, to general employee parking. Currently, approximately 78 spaces are designated for non-employee use. These spaces are only 55 percent occupied, resulting in about 43 available spaces. As part of its Transportation System Management Plan (TSMP), Laguna Honda Hospital will evaluate the number of parking spaces provided for employees and non-employees (e.g., visitor) to ensure that on-site parking spaces are used efficiently.[5] Refer also to **Response 44,** which describes the hospital's TSMP.

Laguna Honda hospital employees who are unable to park on-site or who choose to park off-site would continue to seek parking on adjacent arterials such as Laguna Honda Boulevard, Woodside Avenue, and Clarendon Avenue. As the commentors state, the number of available parking on these streets is limited, and would be further reduced in the future by other projects.

The residential permit parking program protects neighborhoods from parking impacts by limiting the duration of parking by non-residents during specified time periods. Over 50 percent of the residents in the affected area must petition the Department of Parking and Traffic (DPT) in order for DPT to implement a permit program. Residential streets in the vicinity of Laguna Honda hospital have designated "T" permits, which restrict parking to four hours during the hours of 8:00 AM to 3:00 PM, except for residents' vehicles displaying "T" parking permits. Vehicles parked for more than four hours on these streets are subject to ticketing.

The discussion of parking impacts on p. 3.2-19 of the Draft EIR describes parking impacts of the proposed project, after construction. The use of Woodside Avenue for temporary parking by YGC employees during construction of the Juvenile Hall Replacement project would no longer be in effect when the proposed project is completed in 2010. Please see **Response 49**, which addresses the use of remote

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5 Lane, Michael, Program Manager, Laguna Honda Hospital, telephone conversation, March 24, 2002.

parking facilities during construction. Please also see **Response 50** concerning use of Woodside Avenue for YGC construction parking.

Comment 41

"We ask that the EIR analyze the parking needs of the Hospital more thoroughly, giving not only the total employment and total parking spaces on the site, but also the number of employees during each shift and the number of unused parking spaces during a typical week." **Pinky Kushner**

"The study gives the total employment on site but it should list the number of employees on site during each shift along with information on the hospital's staggered arrival policy which can determine the use of transit and parking." **Howard Strassner**

Response 41

While total employment at Laguna Honda hospital varies, the hospital operates with the equivalent of about 1,500 full-time equivalent (FTE) employees, which includes part-time employees. Because the largest number of employees work during the daytime shift (from approximately 7:30 AM to 4:00 PM), this period was used to estimate peak parking and transit demand of the proposed project.The hospital shift hours are staggered to minimize the overlap between departing and arriving employees, and provide for a more orderly departure and arrival of employees at on-site parking lots, and the hospital's main entrance.

Footnote 2 on page 3.2-7 of the Draft EIR provides the approximate number of employees per shift and the shift change times. The employee numbers reported in Footnote 2 are FTE employees, and do not reflect the total number of part- and full-time workers during each shift. To clarify the estimated number of workers by shift, the Draft EIR is hereby revised as follows:

> [p. 3.2-7, third paragraph] "However, the peak hour of activity for vehicles exiting the project site occurs from approximately 4:00 to 5:00 PM, due primarily to the 4:00 PM employee shift change ~~of about 1,000 hospital workers~~.[2]"

[p. 3.2-7, footnote 2] "[2] Employee shifts and the number of workers during each shift ~~changes are scheduled to occur at 8:00 AM, 4:00 PM, and midnight.~~ are as follows:

Shift and Time		Approximate Number of Workers
Day:	7:30 AM to 4:00 PM	1,382
Evening:	3:30 PM to 12:00 AM	193
Night:	11:45 PM to 7:45 AM	156

The number of vehicles exiting the hospital is greatest during the 4:00 PM shift change, which involves the departure of approximately 1,380 day shift workers and the arrival of about 195 evening shift workers. The ~~8:00~~ 7:30 AM day shift has the highest number of hospital workers of all three work shifts. Any impact on the local street network would be greatest when the day shift workers depart at ~~during the~~ 4:00 PM ~~shift change~~. Also, the highest parking and transit use demand would occur at the arrival and departure times of the day shift. The ~~8:00 AM shift change (~~departing ~~midnight~~ evening shift employees~~)~~ and ~~12:00 AM shift change (~~departing ~~PM~~ night shift employees~~)~~ involve approximately ~~200~~ 195 and ~~275~~ 155 employees, respectively."

Section C4(a) Off-Street Parking on pages 3.2-10 and 3.2-11 of the Draft EIR contains a discussion of on-street parking supply and occupancy, which is based on more detailed parking inventory and parking data that were provided in the *Laguna Honda Hospital Transportation Study*. Approximately 603 parking spaces are located on the hospital campus, of which 466 are for general employee use, and 137 spaces are restricted for various users including employees with parking permits, volunteers, visitors, disabled, and loading. The third paragraph on page 3.2-11 of the Draft EIR states overall parking occupancy at the hospital in designated spaces is at 90 percent, which would be the equivalent of 60 unused parking spaces available on a typical day. The second paragraph on page 3.2-11 further indicates that 47 illegally parked vehicles were observed to be parked at various locations on the campus. Conservatively, if these vehicles were allocated to designated parking spaces, 13 unused parking spaces would be available.

It should be noted that despite availability of unused parking spaces within the hospital campus, some employees and other visitors to the campus choose to park off-site or illegally, perhaps due to the size and topography of the site and the location of designated parking lots relative to the destination of those drivers. In addition, parking designated for non-employee use is not as well utilized as parking for general hospital employees. For example, the employee parking spaces at the main hospital building are 100 percent occupied, whereas only 55 percent of the non-employee spaces located throughout the campus are occupied.

Comment 42

"Parking We are concerned about the Transit First Policy of the City and the problem of our ever increasing traffic. We note that Laguna Honda Hospital is situated in an area very well serviced by Muni and Muni Metro, with its efficient links as to Bay Area wide transportation systems. From our informal survey, roughly 35% of the existing parking spaces are not used, even at times of seemingly maximal use. **Pinky Kushner**

Response 42

The City's Transit First Policy (Section 16.102 of the City Charter) is defined by a broad set of six principles which collectively state that public transit is an economically and environmentally sound alternative to the private automobile, and that facilitating the use of public transit should be a priority in conducting and implementing all City programs, polices, and affairs. As discussed on p. 3.2-17 and p. 3.2-18 of the Draft EIR, the proposed project would not have a significant effect on traffic conditions and intersection operations, and therefore, no mitigation measures would be required under CEQA. In keeping with the City's Transit First Policy, Laguna Honda Hospital recently prepared a draft TSMP, the goal of which is to minimize single-occupancy vehicle trips generated by the hospital. Refer to **Response 44** concerning Laguna Honda Hospital's TSMP.

See also **Response 43,** which discusses the City's Transit First Policy in relation to the proposed project. Refer to the preceding **Response 41** regarding the underuse of existing parking at certain parking locations within the Laguna Honda campus.

The time and locations of the informal parking survey are not stated by the commenter, and a direct comparison to the parking survey data provided in the *Laguna Honda Transportation Study* (February 2001), and on pages 3.2-11 and 3.2-12 of the Draft EIR cannot be made. If, as the commenter notes, 35 percent of the existing parking spaces are not used, there would be about 210 unoccupied parking spaces available throughout the Laguna Honda hospital campus. This percentage seems high, based on the parking survey data reported in the Draft EIR. As discussed in Response 41, overall parking in designated spaces at the hospital is 90 percent occupied, which indicates roughly 10 percent or 60 of the total existing spaces are unoccupied. (This does not account for cars illegally parked in non-designated parking areas.) Response 41 also notes that parking occupancy is much lower at spot locations within the campus. For example, non-employee parking that is provided at four locations throughout the hospital grounds is only 55 percent occupied, which could account for higher vacancy rates at certain locations. However, for purposes of analyzing parking effects of the project, the surveys conducted for the EIR indicate that parking at the hospital is essentially fully occupied.

Comment 43

"On P. 3.2-15 Paragraph D1(c) Parking states in part: 'Policies in the San Francisco General Plan emphasize the importance of public transit use and discourage the provision of facilities that encourage automobile use.' The EIR also includes a paragraph explaining how a 'shortfall' in parking supply will have only minor environmental impacts. However the transportation analysis proceeds assuming that nearly all of the existing parking was occupied. The EIR should have included an alternative of only providing the employee and visitor parking required by the planning code – 294 spaces rather than the 655 spaces proposed. This should not require any change to the provisions for off-street loading." **Howard Strassner**

Response 43

While policies in the San Francisco *General Plan* emphasize the importance of public transit use and discourage the provision of facilities that encourage automobile use, the *General Plan* also recognizes the importance of containing and lessening the traffic and parking impacts of institutions on surrounding residential areas (refer to the San Francisco *General Plan*, Transportation Element, Objective 33 on page 3.1-7 of the Draft EIR). Laguna Honda hospital has recently developed a Transportation System Management Program (TSMP) that would reduce parking demand by encouraging the use of transit, bicycles, and alternative modes of transportation such as participation in rideshare and carshare programs. Please also see **Response 44** for a description of the hospital's TSMP.

Starting with the second full paragraph on page 3.2-21, the Draft EIR provides a detailed explanation of why the parking shortfalls are not considered to be a physical environmental effect or be considered a significant environmental effect under CEQA.

The Draft EIR does not include an analysis of a project alternative that would provide 294 parking spaces, the minimum number of parking spaces required by the Section 151 of the Planning Code. Section 15126(d) of the CEQA Guidelines requires discussion only of a range of reasonable alternatives to a project that could feasibly attain most of the basic objectives of the project while reducing or eliminating significant impacts that would occur under the proposed project. As noted above, the project-generating parking shortfall is not considered to be a significant impact. Furthermore, the hospital is an institutional use located in an established, urban residential community. Consequently eliminating roughly 300 on-site parking spaces would not be a reasonable alternative to the proposed project due to increased parking and traffic impacts. A reduced parking alternative would neither achieve the project objectives nor meet the intent of CEQA to identify alternatives that reduce environmental impacts.

Comment 44

"This analysis should include some system similar to parking cash out which is mandated by state law for all employers of more 50 people, who pay for parking which they then provide at no cost to employees. They are required to offer employees cash instead of free parking and studies show that this has resulted in increased car pooling and transit use. Parking cash out applies to new construction which would construct employee parking. The proposed parking lots have the obvious costs of construction, maintenance and lighting. There are also hidden costs for the land which would have been better used as open space which could provide health benefits for the residents and neighbors.

We suggest a parking system which: a) Provides some parking for visitors, and occasional parking by employees, within the total provided, with hourly parking fees similar to other hospitals in the City; b) Provides a few spaces with lower parking fees for volunteers; c) Sells monthly parking permits for employees at the market rate, similar to the proposal that the Planning Department is discussing for residential areas where the parking supply is limited; and d) Distributes of all of the revenue collected from b) and c) plus the reduction in the obvious costs of parking to the City, to all employees (based on shift worked) who do not obtain a parking permit.

To illustrate how our suggestion could work we estimate the following: 1) Total monthly income from 294 parking spaces based on approximately $100 for each monthly day shift employee parking permit = $29,400 a month per c) above; 2) Assume that 1) includes all other revenue per a) and b); 3) Add $1.00 a day savings (based on BART's maintenance expense for surface parking lots) for the 361 spaces not provided = $10,800 a month; 4) This totals $40,200 a month; 5) Assume that this amount will be divided between 400 day shift employees (the EIR did not include sufficient information to determine this number) who don't obtain a permit = $100 per employee per month. This is much more than the cost of a Fast Pass (which many employers provide their employees) and ample to induce many employees to car share and help their driver pay for parking. The monthly distributed share plus an employee's reduced automobile expenses will encourage transit use or car pooling even when an employee has to occasionally pay for parking per a) above. The market rate for swing shift will be much lower and the rate for graveyard may be zero.

The study and implementation of our proposed alternative is required by the Transportation Element of the General Code as listed on p. 3.1-7. Policy 33.1 limits the provision of parking and 33.2 protects residential neighborhoods from parking impacts which is already provided for with the existing Residential Parking Permit system. In addition The Planning Department is beginning to reduce the required supply of parking for residential units and people will drive less. The EIR correctly shows that the hospital is well served by transit, within one block, and there is capacity for a few more riders per transit vehicle while a reduction in auto use will reduce the queuing which delays buses." **Howard Strassner**

Response 44

The state law to which the commentor is referring is Senate Bill 2019 (Katz), commonly known as the Parking Cash-Out Program. As the commentor suggests, Laguna Honda hospital could choose to implement some form of cash-out program; however, the hospital is not required to do so under Senate Bill 2019, contrary to the commentor's assertion. The legislation applies only to private companies that have 50 or more employees and lease land where employees park.

In addition, the study and implementation of the type of parking system suggested by the commentor is not specifically required by the Transportation Element of the *General Plan*. Objective 33 of the Transportation Element, listed on page 3.1-7 of the Draft EIR states, "Contain and lessen the traffic and parking impact of institutions on surrounding residential areas." Policy 33.1 of this objective is to "Limit the provision of long-term parking facilities at institutions and encourage such institutions to regulate existing facilities to assure use by short-term clients and visitors." Objective 33 and Policy 33.1 of the Transportation Element both encourage projects that both reduce parking impacts on residential areas and limit long-term parking. However, no specific programs or measures are mandated.

Laguna Honda hospital recently developed a Transportation System Management Program (TSMP) (February 4, 2002) to encourage the use of transit and alternative modes of transportation. The TSMP outlines general educational, promotional, and financial incentive measures to encourage the use of transit and alternative modes of transportation. The program is still being refined and does not include an implementation schedule, performance measures, or program evaluation standards. The stated goal of the TSMP is "to minimize single-occupant vehicle trips to the extent possible to ensure the most efficient and effective movement of people and vehicles to, around, and from the Laguna Honda campus in order to mitigate the impact of the Laguna Honda Hospital Replacement project construction, and efficiently manage existing and proposed parking resources and maximize access and enhance mobility for employees, visitors, residents and volunteers." Following the completion of project construction, the TSMP calls for several measures to reduce parking demand, including employee transportation subsidies, fare discounts through the use of transit vouchers, ride matching services, participation in the City Carshare program, and a no-interest loan Bicycle Purchase Program, as well as the installation of A secure, enclosed bicycle parking facility. The current TSMP does not include an employee paid parking or "cash-out" system. However, the program is evolving, and states that " . . .the Laguna Honda Hospital TSMP will consider application of all TSMP programs available now or in the future so long as they are deemed efficiently applicable to the overall goal of reducing peak hour trips."

While some municipalities have voluntarily implemented some form of parking cash-out programs for public employees, currently there are no City and County of San Francisco agencies or departments that

have established an employee cash out program. San Francisco agencies do, however, offer tax breaks for monthly transit passes and purchases.[6]

Pedestrian Impacts

Comment 45

"We continue to be concerned for pedestrian safety at the north end of Dewey Boulevard. We would like the Hospital (and/or the City) to further explore (a) rehabilitating the pedestrian tunnel from the Forest Hill Muni station to the to the other side of Laguna Honda Boulevard or (b) building a pedestrian bridge in the vicinity." **Davis R. Schwartz**

Response 45

Existing pedestrian safety conditions at the north end of Dewey Boulevard are present conditions that would continue to occur with or without the proposed project. On p. 3.2-22, the Draft EIR evaluates the impacts of the proposed project on pedestrian safety, and concludes that the project would not result in a significant environmental effect related to pedestrians. Since the project would not have any significant environmental impacts on pedestrians at Dewey Boulevard or elsewhere, no mitigation measures are required.

Neither Laguna Honda hospital nor the City currently has funding for major pedestrian improvements in the vicinity of the Forest Hill MUNI Station. MUNI is currently conducting some minor upgrades to the Forest Hill Station, but indicates that funding is not available for rehabilitating the existing pedestrian tunnel or building a pedestrian bridge. DPT indicates that traffic signal improvements could also improve safety conditions by reducing conflicts between pedestrians crossing Laguna Honda Boulevard and vehicles making U-turns from the jug handle across the crosswalk on the same signal phase. However, DPT currently does not have funding for signal improvements at the Forest Hill Station.

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6 Rivasplata, Charles, Planning Department, written communication, April 24, 2002, and Rick Ruvalo, Manager, City Employee Commute Assistance Program, telephone conversation, April 24, 2002.

Bicycle Impacts

Comment 46

"Also, the Hospital driveway feeds directly onto one of the city's major bike routes, on 7th Avenue. When I taught at San Francisco State University, I used this bike path on my daily commute. That stretch in front of Laguna Honda was by far the most dangerous part of my commute. Every time I biked down that hill in front of the Hospital, I was scared I was going to be killed. Part of the problem was how little regard most drivers had for the posted speed limits, but the other part came from cars entering and exiting the hospital driveway. An increase in motor vehicle traffic at that intersection would turn an already extremely hazardous situation into one that is potentially deadly for bicyclists and pedestrians." **Katherine Roberts**

Response 46

Laguna Honda Boulevard is designated as part of the Citywide Bicycle Network (Routes #65 and #60). In the hospital vicinity, Laguna Honda Boulevard is a shared bicycle route (Class III) between Clarendon Avenue and Woodside Avenue, and a bicycle lane (Class II) north of Clarendon. Posted speed limits on Laguna Honda Boulevard are 25 miles per hour (mph). Existing traffic safety conditions related to speeding are not directly related to the proposed project. The Laguna Honda Boulevard/Woodside Avenue/Dewey Boulevard intersection would continue to operate at acceptable service levels under existing conditions, with the project, and with the project under future cumulative conditions in 2015 (see Table 3.2-2 on page 3.2-18, and Table 3.2-3 on page 3.2-26 of the Draft EIR). While intersection operation conditions are not directly applicable to bicycle safety, the proposed project would not substantially increase traffic or worsen operating conditions at the hospital driveway intersection. In addition, the planned two-way access to and from Woodside Avenue will reduce auto use of the main driveway to and from Laguna Honda Boulevard, thereby potentially reducing the extent of existing conflicts between autos and bicyclists.

The impacts of the proposed project on bicycle travel are evaluated on p. 3.2-22 of the Draft EIR. That discussion concludes that the project would not create hazardous conditions or interfere with bicycle accessibility and, therefore, would not result in significant environmental effects on bicycle conditions.

Construction Impacts

Comment 47

"We sent you a letter and you were kind enough to include it in the draft. And most issues have been covered, except for the construction traffic. We are concerned that there will be construction traffic coming from Portola from the south, down Claremont and up to Dewey -- down two blocks to Dewey. There's also West Portal school at Dewey; and there are crosswalks and children there every day, five days a week. We understand that there will be some construction traffic coming through there during the Youth Guidance Center reconstruction. So that probably will give us 10 years of very dangerous Safeway trucks coming through and buses that dead end at the end of the day, in the evening, and they're not supposed to come through. The street has become a very busy, dangerous street. And we're very concerned about that. And I understand that the construction traffic hasn't been set yet; so we would like to know how to approach that problem, both coming from the north and from the south. And once again, thank you for including our letter and most of our concerns have been answered. And I thank you for the time." **John Balestreri, Planning Commission public hearing comments, January 10, 2002**

"It's my understanding that the current plan shows that construction vehicles will approach Laguna Honda Hospital and that project by turning off (sounds like) Brook Boulevard at Claremont Boulevard and then head up to towards the Dewey Circle and towards the hospital. And as my husband alluded just prior, there is the West Portal Elementary School there and lots of foot traffic and a neighborhood field. I'm concerned, and all of us are, about the heavy trucks that move through -- would be moving through this residential neighborhood. As an easy alternative I would like to propose that the trucks come from the southwest continuing on Portola Drive and then turning at Woodside to access Laguna Honda Hospital that way. If they are unable to make that sharp turn into Laguna Honda Hospital from that approach, I would recommend that instead they go down 19th Avenue, turn up Lincoln Boulevard, and then on 7th Avenue, and then they can easily make a left-hand turn into the hospital. I would like to propose those alternatives for your review and in order to keep the residential neighborhood and quality of life in the West Portal/Forest Hills area. Thank you." **Katie Balestreri, Planning Commission public hearing comments, January 10, 2002**

"Specific construction traffic routes must be identified. Restrictive covenants on traffic, parking, and cycling of trucks on neighborhood streets must be put in place prior to issuing building permits. Analysis of traffic impacts due to the entrance off Idora should be completed. This has been an item that many have spoken to and has been something that we asked the project team to do for several months as part of the scoping process." **Eileen Fanelli, Planning Commission public hearing comments, January 10, 2002**

"We are very opposed to the idea of construction trucks hauling materials on Dewey Boulevard for two reasons. One, there are potential safety problems at Dewey Circle, where there is already considerable traffic associated with the drop-off and pick-up of children at West Portal Elementary School; loaded

construction trucks don't exactly stop on a dime even when there is a crossing guard. Two, Dewey Boulevard was not constructed for heavy truck traffic. We are already experiencing (a) cracking in the roadway and (b) subsidence of our sidewalks and boulevards due to the inappropriate use of Dewey Boulevard by Muni buses and Safeway trucks. We are trying to get such heavy vehicles off Dewey Boulevard; we are not looking for heavy construction trucks to exacerbate the problems." **Davis R. Schwartz**

"I also just want to echo something Ms. Balestreri commented on: Regional access routes. She is right. I mean, Dewey Boulevard can't handle the traffic. And in the EIR it suggested that really trucks coming from the south will use 280 and exit at San Jose Avenue. Well if anyone has ever tried to negotiate that exit on San Jose, take that hard right to get to Bozworth to Oshaughnessy, I challenge a large truck to do it without running into something. So I think traffic originating from the south won't be able to use 280 as the EIR states and that they will be forced to divert themselves onto Portola, Claremont, and then onto Dewey. From the east it's suggested that they can use 280 and exit Monterey Boulevard and come up Oshaughnessy, but I also challenge them to take Monterey and hang the hard right and go past the Glen Park BART station. That's a traffic nightmare to begin with. So I suggest that what they're probably going to do in the near future will be using the Fell Street offramp on 101, but that's later to be demolished while they're rebuilding Octavia Boulevard. So what I'm asking is that the EIR in its final draft really articulate exactly what routes the construction people and the large trucks should take, because right now the alternatives that are discussed really aren't realistic. And as anyone who resides west of Twin Peaks, including Commissioner Theoharis, knows if you get lost, you can end up on some very tiny streets that lead you in circles. And we really would prefer the trucks and drivers not be forced to do that. In addition, the last element is that they show trucks leaving the project using 7th Avenue going to Lincoln Way to access 19th Avenue. You cannot take a left-hand turn on 7th Avenue. So what they're going to be forced to do is to turn left at Irving/Judah, which doesn't have a signal for left turns. And Irving and Judah are both transit thoroughfares." **Steve Suacci, Planning Commission public hearing comments, January 10, 2002**

"The EIR should more thoroughly examine the traffic and parking impacts which will occur at different stages during the planned eight years of construction." **Harold Wright**

"As an adjacent residential district, the Forest Hill Association is essentially concerned with the external environmental and traffic effects of the Replacement Project, both during the prolonged anticipated demolition and construction and upon completion." **Harold Wright**

Response 47

Page 2.0-18 of the Draft EIR in **Chapter 2.0, Project Description, Section E.4., Proposed Construction Phasing Plan**, presents three possible construction truck routes that were identified for the proposed project. Since publication of the Draft EIR, the project sponsor and the Department of Parking and Traffic

(DPT) have examined other possible truck routes that would minimize traffic and circulation impacts. These routes are described in **Response 10**. All of the routes assume that the two-way Woodside Avenue driveway would be available for use by the hospital. The proposed use of the Woodside driveway by Laguna Honda during construction has been agreed upon by the YGC. None of the routes would include the use of Dewey Boulevard, Claremont Avenue, or O'Shaughnessy Boulevard. Thus, these streets would not be subject to construction truck traffic. As a commentor states, left turns from Lincoln Way onto 7th Avenue are prohibited. The revised construction routes do not require left turns from Lincoln Way to access the site from the east, and incorporate a commentor's suggestion of using Portola Drive for access to the site from the southwest.

Potential traffic impacts associated with the Woodside Avenue/Idora Avenue intersection are addressed in **Response 35**. Refer to **Responses 37, 38, and 39**, which address traffic effects of the project after completion. Pedestrian safety conditions are discussed in **Response 45**. Please also see **Response 50** for a discussion of on-street parking restrictions that would be imposed during the construction period.

Comment 48

"p. 3.2-1: 'A Summary' Under the Transportation, Circulation and Parking section and based on preliminary construction plans, 'truck traffic would range from an average of 7 trucks per day to a PEAK of 15 trucks.' Our preliminary analysis breakdowns as follows:

G/C supervisory vehicles	20-30 (1/2 ton to 1 tn. Trks.)
Concrete Pour of 200 to 325 CY	25-40 (cycling in/out of LHH)
Architectural Constr. (M/E D/W, etc.)	50 (100 workers with 2/car)
TOTAL	95 – 120

The Draft EIR does not describe how it calculated an average and peak level of truck traffic into and from the site. It does not describe the type of trucks that will be used; it does not describe the construction in enough detail to understand the types of construction materials that will be used, how they will be brought to the site, and placed and when the major delivery of materials will occur. This information should be included so the reader can understand the basis for statements made in the report." **Eileen Fanelli**

"Today I'd like to address the major construction impact issues mentioned in the Draft EIR as directly affecting the surrounding neighbors. The two major issues are that of construction vehicles and also the excavation process. Under the Transportation and Circulation and Parking section, and based on the preliminary construction plans, quote: Truck traffic will range from average of seven trucks per day to a

peak of 15 trucks. Our preliminary analysis breakdown is as follows: The general contractor and supervisory vehicles would range from approximately 20 to 30 vehicles. This consists of half-ton to one-ton trucks.

Now if there was a concrete pour during this time of approximately 200 to 300 yards, that would mean 25 to 40 Ready-Mix trucks, eight yard trucks, cycling in and out of Laguna Honda. Now during another phase of the construction and at the same time, though, but a different phase, if there were architectural construction going on, such as mechanical and electrical interior finish-out work, that would impose about another 50 construction vehicles. As you can see this totals between 95 and 120, not 15. In the same section it states that, quote: During most phases of the construction, it is anticipated that construction-related parking could be accommodated within the project site. But during the peak construction period, the contractor may need to make arrangements at remote parking facilities off site. It also states that construction traffic affects would not be considered significant. We consider the hundred-plus vehicles or trucks to be very significant and would like restrictions imposed on the contractor preventing any construction parking or ushering of construction vehicles on the adjoining streets." **Richard Parrino, Planning Commission public hearing comments, January 10, 2002**

Response 48

The construction management consultant for the proposed project, Turner Construction/CDM, a Joint Venture (Turner Construction), generated the estimates of construction-related truck trips cited in the Draft EIR. Turner Construction is the largest privately owned construction contractor in the United States, and is among the top five contractors in the Bay Area. The firm has been in business for over a century, and has managed major construction projects within the City and County of San Francisco. Turner Construction estimated the number of construction-related truck trips based primarily on materials and finishing requirements for new and rehabilitated buildings on the site.

The commentors correctly identify the different types of construction truck requirements for various construction activities. However, the truck trip estimates provided by the commentors are overstated, for the following reasons: The estimate of an average of seven trucks per day to a maximum peak of 15 trucks per day as discussed in the second full paragraph on page 3.22-24 of the Draft EIR accounts only for heavy-duty construction delivery vehicles. These would be 40-foot-long trailer trucks that would deliver primarily structural steel, reinforcement steel (rebar), concrete, dry wall, and construction equipment. No trucks would be delivering fill material, as fill would be balanced and stored on-site. Light-duty construction delivery trucks (i.e., pick-up trucks) for supervisors, construction management, staff, and architects are included in the estimate of construction worker trips and of construction worker parking demand estimate, as discussed in **Response 49.** During the peak construction phase, Phase Two,

there would be one concrete pour delivery per week, for up to three years.[7] Also, during the last phase of construction, Phase Three-B, there would be about 125 heavy-duty trucks scheduled over a six-week period for hauling soft demolition debris (e.g., cabinets, doors, flooring).

Turner Construction indicates that because the hospital would remain in operation and building demolition would occur in phases throughout construction, the number of heavy-duty construction trucks delivering materials to the site at any one time would be scheduled daily by the construction contractor and management consultant. The delivery and haul schedules for all heavy-duty construction trucks would be closely scheduled, managed, and controlled to minimize on-site traffic congestion and off-site queuing of trucks, particularly on Laguna Honda Boulevard, Woodside Avenue, and other nearby streets.[8] In addition, the ability to queue 40-foot-long trailer trucks on-site would be constrained as available site area would be used to stage and marshal construction equipment and supplies and to provide construction worker parking. Therefore, the number of construction trips estimated for the proposed project is lower than would be the case for a project on a cleared, vacant construction site.

To clarify the number and type of construction truck trips on-site, the Draft EIR is hereby revised as follows:

> [p. 3.2-24, second paragraph, starting with the eighth sentence] "Based on preliminary construction plans, truck traffic would range from a typical average of seven trucks per day to a maximum peak of 15 trucks per day. These trips account for heavy-duty construction delivery vehicles. These would be 40-foot-long trailer trucks that would deliver primarily structural steel, reinforcement steel (rebar), dry wall, and construction equipment. Light-duty construction delivery trucks (i.e., pick-up trucks) for supervisors, construction management, staff, and architects are included in the estimate of construction worker trips and are not part of the estimate of heavy-duty construction delivery vehicles.
>
> Peak truck traffic would occur in ~~the first year of Phase Two~~ toward the end of Phase Two when construction of the Greenhouse Building, Link Building, and Clarendon Hill East Building would occur simultaneously.[16] The most intensive construction activities during this peak construction period would last up to six months. "

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7 Bjorkman, Craig, Project Executive, Turner Construction, telephone conversation, April 26, 2002.

8 Bjorkman, Craig, Project Executive, Turner Construction, telephone conversation, March 4, 2001.

16 Craig Bjorkman, Turner Construction Company, letter communication, November 12, 2001.

The construction management consultant specifications for the proposed project could include parking restrictions similar to the following language that has been included in the construction specifications for the YGC project:

> Employees of the Contractor, subcontractors, and suppliers shall not park their vehicles outside of the active construction area within where they are currently working and where public access is prohibited. The Contractor shall provide parking for their employees at a site, which will not impact local residential areas.

Construction Parking

Comment 49

'During the peak construction period, the project sponsor and contractor may need to make arrangements at remote parking facilities to provide shuttle service...for both construction workers and hospital employees.' "Where do they intend to stage this? How are workers and equipment going to be shuttled to and from the project site? Is this a realistic option and has it been implemented successfully at other construction sites in the City?" **Eileen Fanelli**

"p. 3.2-25: 'Assuming that a portion of the construction workers car-pooled and used transit....'. This assumption seems highly unrealistic. Are there other projects where workers car-pooled and used public transit at the levels assumed in the Draft EIR?" **Eileen Fanelli**

"In addition the EIR states that a remote parking facility will be identified for workers and staff. I'd like to ask where that will be in San Francisco. Where is this spare land; where is this spare parking? Maybe San Bruno. I don't know. Maybe they can find some down there. It also suggests that workers on the project will -- a portion of them car pool or use transit. I have yet to see construction people haul their tools in on transit or even car pool. I think they all come by truck." **Steve Suacci, Planning Commission public hearing comments, January 10, 2002**

Response 49

The project sponsor and construction contractor have refined the construction phasing plans so that all of the construction worker and employee parking can be accommodated on site throughout all construction phases, including the peak phase, while essentially maintaining the existing 603 parking spaces available for hospital staff and visitors. Therefore, the use of remote construction worker parking facilities during

the peak construction period is no longer required.[9] The Draft EIR is hereby revised as follows to reflect the changes to the construction phasing to accommodate construction worker and employee parking on site:

[p. 3.2-25, third paragraph, beginning with the third sentence] "During most phases of construction, it is anticipated that construction worker parking demand could be accommodated within the project site, while still maintaining ~~T~~the existing 603 spaces ~~would be maintained or increased throughout almost all phases of construction~~ for hospital employees and visitors. In the early part of Phase One, all 603 existing spaces would be available~~, and the number would increase to about 655 spaces as new parking is added to the site.~~. However, during the 2.5-year peak construction period, parking available to employees and visitors would dip to 587 spaces, 16 fewer spaces than currently exist. During Phase Two, ~~390 of the existing parking spaces would remain, and 460 new spaces would be added for a total of 850 spaces~~ roughly 602 spaces would be available to hospital employees and visitors. ~~During~~ In Phase Three-A, total on-site parking would ~~range from 695 spaces to 839 spaces, as new spaces are provided with the new construction.~~ decrease to 590 spaces, or 13 fewer spaces than are currently provided. In Phase Three-B, the number of parking spaces would ~~be reduced temporarily to 591, 12 spaces fewer than currently exists.~~ slightly increase to 621 spaces, as new spaces are ~~provided with the new~~ constructed. ~~During the peak construction period, the project sponsor and contractor would make arrangements at remote parking facilities, if necessary, to provide shuttle service to the site for both construction workers and hospital employees during a five month period.~~ After Phase One, the hospital's 47 laundry facility workers would be relocated off-site, which would free up an additional 30 employee parking spaces.

The temporary decrease of up to 16 parking spaces during Phase One of construction could likely be accommodated on site and would not result in a substantial increase in off-site parking. After Phase One, any temporary decrease in parking would be off set by the 30 employee parking spaces that would become available when the laundry facility and workers are relocated off site. Therefore, the proposed project would not result in a significant impact pertaining to construction-related parking demand."

[p. 1.0-6, second paragraph] "During ~~most phases of~~ construction, it is anticipated that construction-related and hospital employee and visitor parking could be accommodated within the project site. ~~During the peak construction period, the project sponsor and~~

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9 Turner Construction, Laguna Honda Hospital Replacement Parking Study EIR Update, February 15, 2002.

~~contractor may need to make arrangements at remote parking facilities to provide shuttle service to the site for both construction workers and hospital employees.~~"

Please refer to **Response 40** for a discussion of laundry-worker parking demand.

The construction management consultant for the proposed project is Turner Construction. Refer to **Response 48** for a discussion of this firm's credentials. Turner Construction developed the construction worker parking demand estimates based on a construction management software, called Resource Allocation Control System (RACS), which is commonly used throughout the construction industry. The software assists project managers in determining a project's staff requirements based on schedule, cash flow, and phasing. The number of construction workers for the proposed project was determined using the RACS model, and the construction worker parking demand was estimated using the number of construction workers and applying a factor for carpooling and transit use. Turner determined a factor of 10 percent carpool use and 10 percent transit use, which is the equivalent of a 20 percent single occupancy auto mode split. This mode split ratio coincidentally is the same as the mode split which was applied to Laguna Honda hospital workers in the Draft EIR trip generation analysis.

Turner Construction indicates that a 20 percent mode split is not unreasonable, and in fact somewhat conservative for San Francisco construction sites. Typically, San Francisco draws its labor pool for construction work from the East Bay regions, including Solano County, western Contra Costa County, and as far away as San Joaquin County from cities such as Brentwood, Stockton and Tracy. Typically, workers carpool to take advantage of high occupancy vehicle (HOV) lanes, or drive to the Bay Point BART Station and take BART into the City. Because the Laguna Honda site is near the Forest Hill MUNI Station, Turner indicates that transit and carpool use would be more typical of downtown San Francisco construction projects, which have a higher than 20 percent mode split rate. Each contractor would provide its workers with a secure location on site to store their personal tools and equipment.[10]

To clarify the estimate of construction workers and parking demand, the Draft EIR is hereby revised as follows:

> [p. 3.2-25, first sentence (continued from previous paragraph)] "Phase Two would be the most labor-intensive phase of construction and would require an estimated maximum of ~~220~~ 280 workers for a five-month period."
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> [p. 3.2-25, first full paragraph, beginning with the third sentence] "Assuming that ~~a portion~~ 10 percent of the construction workers car-pooled and 10 percent used transit, approximately 80 to 130 construction worker vehicles would travel to the project site.

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10 Bjorkman, Craig, Project Executive, Turner Construction Company, telephone conversations, March 1, March 4, and April 26, 2002.

This traffic would somewhat affect the operating conditions at the nearby intersections. The addition of vehicles during the peak construction period (a maximum of approximately 220 ~~workers~~ vehicles) would have a greater impact on those intersections, although these impacts would not be considered significant as the increased traffic would not create traffic congestion that would substantially contribute to a significant decrease in air quality, or substantially interfere with transit, pedestrian, or bicycle access to the site."

Cumulative Impacts

Comment 50

"The overlap in the [Laguna Honda hospital and YGC's] construction schedule[s] must be discussed as part of cumulative impacts." **Eileen Fanelli**

"But the fact that the traffic issues, the changes are not going to mitigate traffic problems. It reduces access to our houses. It stops our ability to get to and from and it makes it extremely difficult to get in and out, especially when three projects are going to be all going at the same time." **John Paul, Planning Commission public hearing comments, January 10, 2002**

"My concern is what's going to happen to all of us when we have Laguna Honda -- I mean also have YGC being built and all of a sudden we have all this construction. There's not going to be any room for the neighbors." **Ann Wharton, Planning Commission public hearing comments, January, 10,2002.**

Response 50

Three projects whose construction schedules would overlap with that of the proposed project are planned for construction in the vicinity of the Laguna Honda campus. The projects are the Sutro Reservoir and Pipeline project, the Juvenile Hall Reconstruction project, and the Clarendon Avenue/Laguna Honda Boulevard Signalization project. Refer to **Response 17** regarding these cumulative construction projects. To address the potential cumulative, combined impacts of these projects with the proposed project, the following text has been added to the Draft EIR:

[p. 3.2-27, added to end of the text] "Construction of the proposed project would be phased over an eight-year period, beginning in the third quarter of 2002, and ending by the end of 2010. During the first five years of project construction, three other projects in the vicinity of the project site would be constructed simultaneously.

One project is the Sutro Reservoir and Pipeline project sponsored by the S.F. Public Utilities Commission. Construction of the project is scheduled to occur between March 2002 and September 2003[17], although actual construction work may not begin until summer of 2002. The reservoir segment of the project mostly includes rehabilitation of the reservoir and miscellaneous improvements. Minor traffic impacts and no on-street parking impacts are expected to occur because most construction activities will be confined to the reservoir site, which is located at the northeast corner of Clarendon Avenue and Olympia Way. The pipeline portion of the project consists of the third and final phase of construction of the Sutro Reservoir inlet pipeline. Construction will involve the installation of a dedicated 36-inch diameter steel pipeline from the Central Pump Station located at Sloat Boulevard and 23rd Avenue, across Santa Clara Avenue up to Portola Drive to Claremont Boulevard, over Claremont Street to Dewey Boulevard, and terminating at Laguna Honda Boulevard, where the pipeline will connect with existing pipeline segments constructed in two previous phases. (This project is separate from the Clarendon Pump Station and Related Pipeline project that was constructed on Laguna Honda Boulevard, between Clarendon Avenue and Dewey Boulevard, from June 2000 to August 2001.) The pipeline will be installed within the street right-of-way. Construction will require possible traffic re-routing and lane closures, although one lane of traffic will be maintained in each direction throughout construction. On-street parking may be temporarily restricted in areas under construction. Traffic control measures such as uniformed officers at busy intersections during commute hours, solar message board, and traffic re-routing signs would be implemented during construction.

Phase One of the proposed project, which is scheduled for completion during Fall 2003, would overlap with the Sutro Reservoir and Pipeline project. Mostly on-site utilities access work would occur during Phase One, which would not substantially contribute to cumulative construction traffic and parking impacts in the project vicinity (i.e., on Dewey Boulevard and at the Dewey Boulevard/Laguna Honda Boulevard intersection) during construction of the Sutro Reservoir and Pipeline project.

A second project, the Juvenile Hall Reconstruction Project, is described on p. 3.1-9. That project site is located immediately east of the Laguna Honda hospital campus, with

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17 Sutro Reservoir – New Inlets, Roof Repairs and Miscellaneous Improvements Fact Sheet; and 36-Inch Sutro Pipeline From Central Pump Station to Dewey Blvd./Laguna Honda Blvd. Fact Sheet, and Marcy Adams, Public Involvement Coordinator, PUC Distribution Division, telephone conversation, March 4, 2002.

construction scheduled to begin in November 2002 and end by March 2005.[18] Phase 1 construction of the YGC project entails the first half of on-site hazardous materials abatement from June to September 2002, followed by demolition, building construction, and partial site development from November 2002 to June 2004. The new Juvenile Hall facility would be completed and occupied in June 2004. Phase 2 would involve completion of remaining on-site hazardous materials abatement from June to August 2004, and construction of an outdoor recreation field and remaining site development from August 2004 to March 2005. Peak construction activities would occur from November 2002 to June 2004 when demolition and construction of the new Juvenile Hall occurs.

Phase 1 of YGC construction would overlap for about a year with the Sutro Reservoir and Pipeline and construction of the proposed project. The Department of Public Works is undertaking traffic control measures to minimize traffic and parking effects of the pipeline project.

Estimates of construction-related truck trips and construction worker trips have not been developed for the YGC project.[19] The new Juvenile Hall facility would be completed during Phase 1, and occupied by the time peak construction of the proposed project occurs. Phase 2 construction of the YGC project would overlap with peak construction of the proposed project. However, YGC construction activities during this phase would be less intense, and involve on-site hazardous materials abatement and construction of an outdoor recreation field. No major building demolition or new construction would occur during Phase 2 of the YGC project.

The construction phases of the two projects would overlap for about 2.5 years. The Woodside Avenue driveway improvements will be completed prior to the start of construction of both the Laguna Honda and YGC projects. During this period, the combined construction activities would result in increased construction truck and construction worker vehicle traffic, particularly on Woodside Avenue, as both facilities plan to use the Woodside driveway as the primary ingress/egress for construction trucks and construction worker vehicles. Construction-related traffic, particularly truck traffic, could cause delays and affect intersection operations due to the slower speeds and turning movements of trucks. Such delays would particularly affect the

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18 Bigelow, Chris, Department of Public Works, Bureau of Architecture, telephone conversation, February 29, 2002.

19 Bigelow, Chris, Department of Public Works, Bureau of Architecture, written communication, June 14, 2002.

Woodside/Avenue/Portola Drive intersection, which would be used for truck access to the site from the south, east, and north. (Refer to page 2.0-18 for a description of the proposed truck access routes to the site.)

Laguna Honda hospital employees who now park on Woodside Avenue would be displaced during construction of the YGC project. The Department of Parking and Traffic (DPT) will reserve parking on Woodside Avenue between Portola Drive and Laguna Honda Boulevard for YGC employees during YGC construction by use of a temporary sticker or dashboard placard. A total of approximately 115 on-street spaces will be reserved for YGC employees on Woodside Avenue and Twin Peaks Boulevard. Similar parking arrangements have been made with DPT for on-street parking on Twin Peaks Boulevard between Portola and Panorama Drives. The reserved parking arrangement with DPT will end after YGC construction is completed. During this period, Laguna Honda employees who park on Woodside Avenue or Twin Peaks Boulevard may be able to park on the Laguna Honda campus, since some of the non-employee parking lots are underutilized. Otherwise, these Laguna Honda employees would need to find alternate parking locations on nearby residential streets or seek parking at farther distances.

Representatives of Laguna Honda hospital and the Juvenile Probation Department have agreed to meet regularly during construction of both the Laguna Honda hospital and YGC projects to coordinate respective construction activities and schedule, so as to minimize potential off-site traffic and parking impacts in the neighborhood.

The third project is the Clarendon Avenue/Laguna Honda Boulevard Signalization. DPT has requested funding of this intersection in Fiscal Year (FY) 2002-2003. If funding is approved in FY 2002-2003, this project would be constructed between fall 2003 and summer of 2004 and would overlap for a short period with the construction of both the Juvenile Hall Reconstruction project and the beginning of Phase Two construction of the proposed project. Signal installation and improvements would require a maximum of two months to complete. During this two-month period, trenching would require lane closure. However at least one lane of traffic would remain open in each direction at all times. Also, on-street parking could be temporarily prohibited in the immediate vicinity of trenching activities. All construction would occur during off-peak hours, between 9:00 AM and 3:00 PM.[20] As discussed on p. 3.2-5, this intersection, under existing unsignalized conditions, operates at LOS C for the worst approach (westbound at

[20] Velasco, Manito, Department of Parking and Traffic, telephone conversation, April 29, 2002.

Clarendon Avenue). In addition, this intersection would not be used as a construction truck route for the proposed project. During construction, there could be delays in turning movements and through traffic at this intersection for up to two months, which would not be considered a significant effect (because it would be temporary). After signalization, traffic flows and turning movements would be improved at the Clarendon Avenue/Laguna Honda Boulevard intersection for the remaining construction phases of the YGC and Laguna Honda projects.

While the cumulative construction traffic effects of the proposed project, combined with the Sutro Pipeline, Juvenile Hall Reconstruction, and Clarendon Avenue/Laguna Honda Boulevard Signalization projects, would not be a significant environmental impact, residents and vehicles traveling in the project vicinity would experience temporary and intermittent delays and inconvenience during construction, particularly when the Juvenile Hall replacement and the proposed project could both be under construction."

(Refer to **Response 10** for a description of the proposed truck access routes to the site.)

3.3 VISUAL QUALITY

Existing Off-Site Views of the Project Site

Comment 51

"The site – partially or entirely – is visible from any homes in Midtown Terrace, primarily from many of those located on its west-facing terraced portion. **Section C-2** (p. 3.3-3) includes the statement 'the site is not visible from the neighborhood areas to the north and east...' **Figure 3.3-4 [View 3: Looking Southwest from Twin Peaks Park]** (p. 3.3-7) clearly shows that is statement does not correspond to fact: the homes in the right to middle foreground are located on Starview Way, Knollview Way, Starview Way and Panorama Drive on that terraced portion.

Of course, view of the site from these streets is not possible, simply because the houses block it. But it is possible from the living rooms of many of these homes. Short of asking for permission to visit some of these homes, one can go to the gap between #19 and #47 Knollview Way, which provides a view of part of the site that is similar to the views from nearby homes. (Clarendon Hall is in plain view; all seven stories of the proposed Clarendon Hill West building will be in full view from there.) We suggest that the quoted statement on p. 3.3-3 be amended accordingly, and that the numerous statements in the report mentioning views from 'Twin Peaks Park' be expanded to include at least that terraced portion of Midtown Terrace." **Gilbert De La Mora, *et al.***

"The judgement of whether any changes of the view of the site from the west slope of Twin Peaks are significant and adverse is one for the individual homeowners to make. At any rate, since they will – or will not – enjoy these views perennially, their opinions – expected not to be unanimous – should be more relevant than those of the occasional hiker or cyclist on Twin Peaks Park." **Gilbert De La Mora, *et al.***

Response 51

The significance thresholds for determining visual impacts are described on p. 3.3-9 of the Draft EIR. As explained, the project would have a significant impact on visual resources if the project would do any of the following: (1) have a substantial, demonstrable negative aesthetic effect; (2) substantially degrade or obstruct any scenic view or vista now observed from public areas; or (3) generate obtrusive light or glare substantially impacting other properties. Views from private residences are not relevant to the EIR visual quality analyses, even if the views from such homes are scenic.

The commentor is correct that the project site is visible from private residences in the area. It appears that views from private residences located on Starview Way, Knollview Way, and Panorama Drive would be affected by the proposed project. Although these effects are not relevant to the analysis of the EIR, the Planning Commission and Board of Supervisors can consider these issues in their review of the approvals for the project.

The only public viewing area generally recognized as providing scenic views of the project site is Twin Peaks Park. The portion of Twin Peaks Park that affords a view of the project site is generally used by hikers and/or cyclists. As discussed on p. 3.3-11 of the Draft EIR, the proposed project would result in significant impacts to views from Twin Peaks Park.

Comment 52

"A situation which in several respects is different from the preceding one exists on the portion of Dellbrook Avenue contiguous to the eastern boundary of the campus. **Section C-3** (p. 3.3-8) includes the statement 'Views from Dellbrook Avenue are generally blocked by the houses along the roadway, but the trees along the eastern project boundary buffer views towards the project site from behind the homes.' The qualifier in this statement can be attributed to the fact that there is at least one large gap in that line of trees, the one west of #56 to #64 Dellbrook Avenue. This gap is noticeable on **Figure 3.3-4** (p. 3.3-7) baring the Bridge Structure, and much wider than indicated on **Figure 2.0-4** (p. 2.0-13). As shown on the attached copy of a photograph taken on December 15, 2001, the gap affords the view of part of the project site, notably the area east of the MUNI substation that serves as a parking lot for assorted vehicles and a huge pile of eradicated, desiccated blackberry bushes and other trash." **Gilbert De La Mora, *et al.***

Response 52

The commentor is correct that the Draft EIR does not identify the gap in the line of trees along the eastern site perimeter. Portions of the project site can be seen through the opening in these trees. In order to clarify the description of views of the project site from Dellbrook Avenue, the Draft EIR is hereby revised as follows:

> [p. 3.3-8, third paragraph, fifth sentence] "Views from Dellbrook Avenue are generally blocked by homes along the roadway~~, but trees along the eastern project site boundary buffer views toward the project site from behind the homes~~. The trees along the eastern project site boundary buffer views of the project site from behind the homes; however, a gap in the line of trees affords a view of the existing bridge structure from the neighboring area east of the campus, as shown in **Figure 3.3-4**."

Figure 2.0-4, Proposed Site Plan, is intended to show the proposed site plan and not existing conditions. For this reason, the existing vegetation shown on **Figure 2.0-4** is in error and has been removed from the proposed site plan. Please refer to **Figure 2.0-4, Proposed Site Plan (Revised).**

Light and Glare - Existing Conditions

Comment 53

"**Lighting**—We commend the EIR for sharing our concern about incidental light. The EIR should mention that Laguna Honda Hospital site is geographically midway between two major natural areas, the Mt. Sutro Open Space Preserve and Mt. Davidson Park. In its current condition, with large areas having minimal exterior lighting, the grounds of the Hospital serve as part of the flyway for some of the few remaining owl populations in San Francisco. The ravens, on the other hand are increasing in the City. Ravens out-compete owls in areas with night light." **Pinky Kushner**

Response 53

The commentor is correct that the project site receives minimal night lighting due to its location between Mount Sutro Open Space Preserve and Mount Davidson Park. Impacts to biological resources were scoped out of the EIR based on the Initial Study, which determined that the proposed project would not result in a significant impact to such resources (see **Appendix 1.0** of the Draft EIR). The biology section in the Initial Study does not address the potential for owls to forage on the project site. For this reason, the Draft EIR and the Initial Study have been revised to include the following statement for informational purposes only:

[p. 3.3-9, text added before the first paragraph] "Laguna Honda hospital is located in an urban surrounding. The majority of lighting sources in the area consist of residential homes, cars, and streetlights. The campus is located roughly midway between two open space areas, the Mount Sutro Open Space Preserve and Mount Davidson Park. These two areas, along with the project site, generate relatively minimal night lighting on a regional scale due to their associated areas of open space."

[p. 31 of the Initial Study, new text to follow the fourth full paragraph] "Laguna Honda hospital is located in an urban surrounding. The majority of lighting sources in the area consist of residential homes, cars, and streetlights. The campus is located roughly midway between two open space areas, the Mount Sutro Open Space Preserve and Mount Davidson Park. These two areas, along with the project site, generate relatively minimal night lighting on a regional scale due to their associated areas of open space.

As mentioned above, the project site includes open space areas that offer minimal night lighting. In addition, the open space area of the project site provides prey (e.g., rodents) for owls and other wildlife in the area. Although owl surveys have not been conducted, given the above, a potential exists for owls in the area to use the project site for foraging purposes during the nighttime.

Increased night lighting could potentially disrupt foraging behavior of owls in the project site. The project design would include low-profile, low intensity lighting directed downward to minimize light and glare. All lighting adjacent to the open space area would be downcast luminaries with light patterns directed away from the natural areas. Therefore, the proposed project would not result in any significant impacts related to owls."

Scenic View Obstruction or Impairment

Comment 54

"My second concern involves my parent's view. They purchased this home [32 Dellbrook Avenue] because it's view to the woods and country-like setting in the garden, where you currently see nothing except trees. I understand that three, seven story buildings are going to be constructed in front of their view. If these are visible from their home, it would be the case or if perhaps because of the different elevations of the land of LHH, these buildings will not be visible from my parent's home?" **Yvonne Howard**

"My concern is that the EIR does not divulge or does not inform people of many things about this particular project. It seems that first off there are going to be seven-story monster towers. They are going to be placed, in fact the institutional scale of things, they are going to be placed not in a valley but on top of the two hills behind this property. We understood originally that they were going to be in the valley. Instead they are on top of the hills, and they are then going to tower over our houses. We have a residential scale. There are two-story houses as a general rule in the area. These are monsters. They're going to be imposed on us. The physical plan, okay, is going to be huge. Looking down our streets, we're going to see these giant buildings over the top of our houses." **John Paul, Planning "Commission public hearing comments, January 10, 2002**

"We object to the proposed Zoning Map Amendment and General Plan Amendment given the character of the surrounding neighborhoods. Increased height, bulk and density would greatly detract from neighborhood views and contribute to an industrial look in a residential neighborhood of predominantly two-story single-family homes and green belts. Seven-story tower blocks must be distributed to no more than currently four-story structures." **Anne and Timothy Poirer**

Response 54

It is likely that the proposed buildings would be visible from the residence at 32 Dellbrook Avenue. Please refer to **Response 51** for a discussion of the relevance of private views to the visual quality analysis in an EIR. **Chapter 3.3** of the Draft EIR addresses project implications on the aesthetics and visual quality of the area. The visual quality analysis in the Draft EIR is based on specific significance thresholds (as defined on p. 3.3-9) to determine whether a project may have a significant effect on visual quality (please refer to **Response 51** above). Pursuant to CEQA *Guidelines*, the Draft EIR based its analysis and conclusions on factual data (e.g., project site plans, visual simulations, etc.).

Visual quality, by nature, is highly subjective and different viewers may have varying opinions as to whether the proposed project makes a positive or negative contribution to the visual landscape of the neighborhood. As such, although the project would include structures that are different in height than most of the structures in the surrounding neighborhood, there is nothing about the proposed height that would inherently result in a negative aesthetic effect. The commentor might consider Clarendon Hall East and West to be "monster towers," but the Draft EIR concludes that the new buildings would be constructed in an area that is already developed, and the heights of the new building would be similar to those of the existing buildings. The roof levels of the proposed buildings would range in elevation from about 560 feet to about 606 feet above mean sea level (msl), while the roof levels of the existing hospital buildings range in elevation from 579 feet to 649 feet above msl. (The references to roof elevations on p. 3.3-11 of the Draft EIR are in error, and have been corrected in **Chapter 5.0, Staff-Initiated Changes to the Draft EIR.**)

As part of the analysis, the Draft EIR provides information on views of the project site from the neighboring areas. As discussed in the Draft EIR, the project site is not visible from neighboring areas to the north and east and is only partially visible from neighboring areas to the south and west, due to the topography and buffer of trees along the project boundaries. Based on the visual simulations and the significance thresholds, a significant impact was determined associated with the construction of the Link Building. Because the scale of the new Link Building would contrast with the generally smaller, finer scale character of the areas seen from the Twin Peaks Park viewpoint, the proposed project would degrade or obstruct scenic views from a public area.

Implementation of the mitigation measures described on p. 4.0-1, **Chapter 4.0** of the Draft EIR would help to soften the appearance of the proposed Link Building and would lessen the prominence of this building as seen from Twin Peaks Park. Also, Mitigation Measure 1 requires landscaping the area east of the Link Building to screen views of the lower portion of the Link Building. Implementation of these mitigation measures would also help soften views of the project site from Dellbrook Avenue. In addition, a landscape buffer would be planted along the east side of the Clarendon Hill West and East Buildings to help screen the views of these buildings from the neighborhood to the east of the project site.

Shade and Shadow

Comment 55

"I wish to speak to just one item. The EIR report dealing with Clarendon Hill East building. That, as a previous speaker mentioned, is a seven-story building. In effect it's built 50 feet higher than anything on Olympia Way. Speaking specifically of my parish. I don't think the EIR speaks to the shadow effect of how that building may have a shadow upon my parish, my church, or what it will look like from Olympia Way and from the park across the street. If you will, it's the back side of the Laguna Honda Hospital project. My parish is 230 feet away from that building. That building will sit 50 feet higher than mine, my parish. We are worried about the shadow and the sights of that building." **Father Sarkis Petoyan, Planning Commission public hearing comments, January 10, 2002**

Response 55

Section 295 of the City Planning Code was adopted in response to Proposition K (passed in November 1984) in order to protect public open spaces from shadowing by new structures during the period one hour after sunrise and one hour before sunset, year-round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant. The proposed project

would facilitate the construction of buildings over 40 feet in height and is therefore subject to Proposition K.

As discussed in the Initial Study, the San Francisco Planning Department prepared a shadow fan analysis for the proposed project, and on the basis of the shadow fan, concluded that potential impacts of the project on shadow would not be significant or adverse. A supplemental shadow analysis was has been conducted to reflect the refined version of the project discussed in **Section 5.0, Staff-Initiated Changes to Draft EIR** of this document. A section has been added to the Draft EIR, **Section 3.7 Shadow**, which presents a detailed description of the shadow analysis and its results. Please refer to **Section 5.0, Staff-Initiated Changes to Draft EIR** of this document for a detailed discussion on the shadow analysis.

The San Francisco Planning Department reviewed the detailed shadow analysis prepared for the proposed project. The Planning Department concluded that the proposed project would not have significant or adverse shadow impacts on adjacent public areas. In addition, the results of the study indicated the proposed Clarendon Hill West and East Buildings would cast shadows toward the northeast during approximately two months of the winter (during the late afternoons). Given the time of day and period of year, the shadow is unlikely to disturb people using the church. The Draft EIR does not include an analysis related to shadow impacts to private properties (such as the church) because private properties are not protected under Section 295 and therefore shadow on the church is not considered an issue under CEQA. Public input regarding the merits of the proposed project may be considered independently of the environmental review process by the Planning Commission at the public hearing on the project approvals, including the Planning Code exceptions pursuant to Planning Code Section 309.

Tree Removal

Comment 56

"The precise extent of tree removal should be determined and mitigation in the form of replacement planting should be considered. A site survey should indicate all trees to be removed and all trees to be preserved. Without such a plan the analysis of the tree removal provided in the Draft EIR is meaningless." **Harold Wright**

Response 56

Tree removal is discussed in two different parts of the Draft EIR. **Appendix 1.0**, Laguna Honda Hospital Replacement Initial Study, Notice of Preparation, and Responses, provides a discussion of the potential

biological impact the project may have with tree removal. Tree removal, in the context of significant changes to the visual character of the project site, is also discussed in Chapter 3.3 of the Draft EIR.

For the purposes of an EIR, biological impacts associated with the removal of trees are related to the diminishing of habitat for special status species and/or the elimination of a wildlife movement corridor. The analysis in the Initial Study was based a field survey conducted on May 23, 2000 by Impact Sciences and on a January 1994 biological scoping study conducted by Leitner, Arnold and Renshaw. As discussed in the Initial Study, special status species do not utilize the trees that would be removed as part of the proposed project and, therefore, their removal would not be considered a significant impact to biological resources. In addition, the hospital campus is not considered a wildlife movement corridor since it is not biologically connected to other habitat.

Tree removal is also discussed in Chapter 3.3 of the Draft EIR, which evaluates whether tree removal would result in a change in the visual character of the surrounding areas. As stated in the Draft EIR on p. 3.3-12, because the majority of trees to be removed are located in the project's interior and not along the project boundaries (which are visible to the neighboring areas), visual impacts due to tree removal would be less than significant. Please refer to Chapter 3.3, Section D2., Tree Removal, for a more thorough discussion of this issue.

Given the above, a tree survey and/or arborist report was not necessary to determine impacts to biological resources and visual quality. Because no significant impacts with regard to tree removal would occur, no mitigation measures would be required. However, as part of the landscaping plans for the proposed project, trees would be planted at a 2:1 ratio to those removed. Replacement trees would consist of drought-tolerant native and mediterranean trees and replacement trees would increase the diversity of trees relative to existing conditions.

3.4 CONSTRUCTION NOISE

On-Site Construction Noise

Comment 57

"Table 3.4-4 (p. 3.4-11) and Table 4.0-1 (p. 4.0-4) show in their respective sections for Phase Three-B (G-H), in the column for Receptor Location, the distance of 250 feet between the closest residential receptor on Dellbrook Avenue and the construction site, evidently the north end of Wing O scheduled for demolition.

Conversely, in the column for Actual Distance, that distance is given as 475 feet, which appears to be based on the distance between those receptors and (not Wing O but) the to-be-built Assisted Living Facility.

Impact Equipment and Trucks (and possibly other noise generating equipment) would be involved in the demolition of Wing O. Therefore, the Actual Distance between these noise sources and the receptors on Dellbrook Avenue is 250 feet. Consequently, the Distance Adjustments should be –14 dBA, rather than –20 dBA, leading to the following needed corrections of dBA values:

Adjusted Leq – Trucks	: 77 (Instead of 71)
Adjusted Leq – Impact Equipment	: 74 (instead of 68)
Mitigated Leq – Trucks (a)	: 61 (instead of 55)
Mitigated Leq – Impact Equipment (a)	: 66 (Instead of 60)

(a): Table 4.0-1 only

Given that the highest estimated unmitigated noise level generated by trucks (77 dBA) would come critically close to the Speech Interference Criterion of 80 dBA, the results of the claimed effectiveness of the attenuation devises to be used will need to be rigorously monitored. If requested, these results need to be made available to concerned homeowners." **Gilbert De La Mora, *et al.***

Response 57

Although the commentor references **Table 3.4-4**, on p. 3.4-11 of the Draft EIR, the distances cited by the commentor are from **Table 3.4-3** on p. 3.4-10, which pertains to Dellbrook Avenue residents. The commentor is correct that the distances cited in the Actual Distance column should be 250 feet. **Tables 3.4-3** and **4.0-1** on pages 3.4-10 and 4.0-4, respectively in the Draft EIR have been revised to reflect the 250-foot distance (see **Tables 3.4-3 and 4.0-1 [Revised]**).

As seen on the revised **Tables 3.4-3** and **4.0-1**, the maximum noise levels in the Dellbrook Avenue vicinity are still considered less than significant because they would not exceed the 80 dBA speech interference criterion. Noise levels would be similar to those that are estimated for the Dellbrook neighborhood during Phase Two. To reflect the revised Table 3.4-3, the Draft EIR is hereby revised as follows:

> [p. 3.4-19, second paragraph, 4th sentence] "Maximum construction noise levels are estimated to reach ~~66~~ 67 to 77 dBA (leq) in the Dellbrook Avenue vicinity, which would be noticeable (increasing ambient noise levels at times by 5 dBA or more), but would not exceed the 80-dBA speech interference criterion (**Table 3.4-3**)."

Table 3.4-3 (Revised)
Maximum Construction Noise Levels at Closest Residential Receptors on Dellbrook Avenue

Receptor Location	Construction Phase	Maximum Noise Source	Reference Hourly Leq in dBA at 50 Feet (1)	Actual Distance in Feet (2)	Distance Adjustment in dBA	Adjusted Leq in dBA	Daytime Ambient in dBA (3)	Adusted Leq Increases Ambient by 5 dBA or more?	Exterior Speech Interference (ESI) Criterion in dBA	Adjusted Leq Exceeds ESI Criterion?
Residents on Dellbrook (Closest Residential Receptors at 350 Feet to the East)	*Phase One (A-C)* Construct Various Utilities & Demolish Central Campus Building	Earthmoving Equipment	85	350	-17	68	54	Yes	80	No
			85	80 (4)	-4	81	54	Yes	80	Yes
		Trucks	91	350	-17	74	54	Yes	80	No
		Materials Handling	85	540	-21	64	54	Yes	80	No
		Stationary Equipment	81	350	-17	64	54	Yes	80	No
		Impact Equipment	88	350	-17	71	54	Yes	80	No
Residents on Dellbrook (Closest Residential Receptors at 300 Feet to the East)	*Phase Two (D)* Construct Greenhouse, Clarendon Hill East, & Link Buildings	Earthmoving Equipment	85	300	-16	69	54	Yes	80	No
		Trucks	91	250	-14	77	54	Yes	80	No
		Materials Handling	85	300	-16	69	54	Yes	80	No
		Stationary Equipment	81	300	-16	65	54	Yes	80	No
		Impact Equipment	88	300	-16	72	54	Yes	80	No
Residents on Dellbrook (Closest Residential Receptors at 750 Feet to the East)	*Phase Three-A (E-F)* Demolish Clarendon Hall & Construct Clarendon Hill West	Earthmoving Equipment	85	750	-24	61	54	Yes	80	No
		Trucks	91	750	-24	67	54	Yes	80	No
		Materials Handling	85	750	-24	61	54	Yes	80	No
		Stationary Equipment	81	750	-24	57	54	Yes	80	No
		Impact Equipment	88	750	-24	64	54	Yes	80	No
Residents on Dellbrook (Closest Residential Receptors at 250 Feet to the East)	*Phase Three-B (G-H)* Demolish Existing Hospital Wings, Construct Parking Lots *Later Phase* Construct Assisted Living Facility	Earthmoving Equipment	85	250	-14	71	54	Yes	80	No
		Pavers	89	250	-14	75	54	Yes	80	No
		Trucks	91	250	-14	77	54	Yes	80	No
		Materials Handling	85	250	-14	71	54	Yes	80	No
		Stationary Equipment	81	250	-14	67	54	Yes	80	No
		Impact Equipment	88	250	-14	74	54	Yes	80	No

Notes: (1) Reference noise levels represent the highest noise levels by equipment type (without use of feasible noise controls) listed in Table 3.4-2 at 50 feet.
(2) The distances listed under "Actual Distance" represent the minimum distances between the closest receptors and facility construction site boundaries by phase.
(3) The daytime ambient noise level represents the daytime Leq noise level estimated based on on-site noise measurements collected as part of this study.
(4) This distance is specifically listed to differentiate noise impacts from construction of the interim electrical facility, and new fueling station, ~~and new satellite dish~~, which would be located closer to this receptor than other facilities under Phase 1.

Table 4.0-1 (Revised)
Maximum Construction Noise Levels at Closest Residential Receptors on Dellbrook Avenue with and without Noise Controls

Receptor Location	Construction Phase	Maximum Noise Source	Reference Hourly Leq in dBA at 50 Feet (1)	Actual Distance in Feet (2)	Distance Adjustment in dBA	Adjusted Leq in dBA	Daytime Ambient in dBA (3)	Adusted Leq Increases Ambient by 5 dBA or more?	Exterior Speech Interference (ESI) Criterion in dBA	Adjusted Leq Exceeds ESI Criterion?	Noise Control Adjustments (4)	Mitigated Leq in dBA	Mitigated Leq Increases Ambient by 5 dBA or more?	Mitigated Leq Exceeds ESI Criterion?
Residents on Dellbrook (Closest Residential Receptors at 350 Feet to the East)	*Phase One (A-C)* Construct Various Utilities & Demolish Central Campus Building	Earthmoving Equipment	85	350	-17	68	54	Yes	80	No	-10	58	Yes	No
			85	80 (5)	-4	81	54	Yes	80	Yes	-10	71	Yes	No
		Trucks	91	350	-17	74	54	Yes	80	No	-16	58	Yes	No
		Materials Handling	85	540	-21	64	54	Yes	80	No	-10	54	No	No
		Stationary Equipment	81	350	-17	64	54	Yes	80	No	-6	58	Yes	No
		Impact Equipment	88	350	-17	71	54	Yes	80	No	-8	63	Yes	No
Residents on Dellbrook (Closest Residential Receptors at 300 Feet to the East)	*Phase Two (D)* Construct Greenhouse, Clarendon Hill East, & Link Buildings	Earthmoving Equipment	85	300	-16	69	54	Yes	80	No	-10	59	Yes	No
		Trucks	91	250	-14	77	54	Yes	80	No	-16	61	Yes	No
		Materials Handling	85	300	-16	69	54	Yes	80	No	-10	59	Yes	No
		Stationary Equipment	81	300	-16	65	54	Yes	80	No	-6	59	Yes	No
		Impact Equipment	88	300	-16	72	54	Yes	80	No	-8	64	Yes	No
Residents on Dellbrook (Closest Residential Receptors at 750 Feet to the East)	*Phase Three-A (E-F)* Demolish Clarendon Hall & Construct Clarendon Hill West	Earthmoving Equipment	85	750	-24	61	54	Yes	80	No	-10	51	No	No
		Trucks	91	750	-24	67	54	Yes	80	No	-16	51	No	No
		Materials Handling	85	750	-24	61	54	Yes	80	No	-10	51	No	No
		Stationary Equipment	81	750	-24	57	54	Yes	80	No	-6	51	No	No
		Impact Equipment	88	750	-24	64	54	Yes	80	No	-8	56	No	No
Residents on Dellbrook (Closest Residential Receptors at 250 Feet to the East)	*Phase Three-B (G-H)* Demolish Existing Hospital Wings, Construct Parking Lots *Later Phase* Construct Assisted Living Facility	Earthmoving Equipment	85	250	-14	71	54	Yes	80	No	-10	61	Yes	No
		Pavers	89	250	-14	75	54	Yes	80	No	-9	66	Yes	No
		Trucks	91	250	-14	77	54	Yes	80	No	-16	61	Yes	No
		Materials Handling	85	250	-14	71	54	Yes	80	No	-10	61	Yes	No
		Stationary Equipment	81	250	-14	67	54	Yes	80	No	-6	61	Yes	No
		Impact Equipment	88	250	-14	74	54	Yes	80	No	-8	66	Yes	No

Notes: (1) Reference noise levels represent the highest noise levels by equipment type (without use of feasible noise controls) listed in Table 3.4-2 at 50 feet.
(2) The distances listed under "Actual Distance" represent the minimum distances between the closest receptors and facility construction site boundaries by phase.
(3) The daytime ambient noise level represents the daytime Leq noise level estimated based on on-site noise measurements collected as part of this study
(4) Noise control adjustments represent the difference in the noise levels with the use of feasible noise controls.
(5) This distance is specifically listed to differentiate noise impacts from construction of the interim electrical facility, and new fueling station, and new satellite dish, which would be located closer to this receptor than other facilities under Phase I

Mitigation Measure B-8 on p. 4.0-3 of the Draft EIR specifies that the construction contractor will be required to provide a designated complaint coordinator, who will be responsible for responding to noise complaints during the construction phase. The complaint coordinator will take steps to resolve complaints, including periodic noise monitoring, if necessary, to ensure that noise impact significance thresholds are not exceeded by project construction activities. Results from the noise monitoring will be made available to the homeowners upon request. Also, please see **Responses 71 and 73** for a discussion of how implementation of mitigation measures are monitored through the Mitigation Monitoring Program.

Comment 58

"I am very concerned about the construction noise during the upcoming renovation of Laguna Honda Hospital. My parents are retired and are at home [32 Dellbrook Avenue] all day every day. They sleep until 9 or 10 a.m. and spend a lot of time in their garden. I am concerned that they will spend their final days being awakened every morning at 7 a.m. by the noise of the construction and that their home and garden will no longer be a tranquil space for them.

I attended a meeting of the LHH Replacement Project Team last night at Laguna Honda Hospital and was told that the construction noise would have 'NO impact outside of the area of the hospital.' This does not seem possible to me and I am concerned that the residents might have just been told what they wanted to hear. I want to be certain that the construction noise will not awaken my parents or disturb them during the day, as the duration of this project, 12 years, is a very long time to live under these circumstances. I would like some assurance about this before the project begins, rather than problems after.

I have spoken to some experts in this regard and have been told that some of the noise could be alleviated by installing insulation in the rear of the house and double pane windows and suggest that you consider doing this for those residents on the perimeter of LHH. I would also ask that you delay doing anything that could be noisy until 9 a.m. rather than 7 a.m." **Yvonne Howard**

"Noise levels are unacceptable for Midtown Terrace neighbors." **Anne and Timothy Poirier**

Response 58

Construction-related noise impacts to residents along Dellbrook Avenue are assessed in **Chapter 3.4, Construction Noise**, of the Draft EIR. The Draft EIR uses significance criteria as an established threshold to identify significant impacts related to noise. Although significant impacts were not identified during some construction phases of the project, some persons in proximity to the project site could consider any level of construction-related noise to be a nuisance. An increase of noise, even below threshold levels, could result in an inconvenience to some people. To indicate the degree of impact associated with

projected constrcution-related noise increases, the Draft EIR identifies increases in ambient noise levels of 5 dBA or more. Although not applied as a significance criterion, this measure shows when increases in noise levels would be noticeable to most people and perhaps a nuisance to some (see p. 3.4-7 of the Draft EIR). However, where the Draft EIR does not identify a significant impact, the adverse effects do not reach the level of "significance," according to the established thresholds.

As stated in **Chapter 3.4**, the most significant noise impacts to the residents of Dellbrook Avenue would occur during Phase One, which would primarily involve the construction of proposed utilities. Utility construction would occur over a one-year period, but the length of construction would be shorter at each facility location. An interim electrical facility is proposed to be constructed approximately 80 to 100 feet from residents on Dellbrook Avenue. Construction of these facilities would occur over a ten-month period and construction of each facility would affect different receptors along Dellbrook Avenue. Earthmoving activities associated with site preparation at each of these facilities would generate the highest noise levels (81 dBA) (see **Table 3.4-3** on p. 3.4-10 of the Draft EIR), which would be noticeable since they would periodically increase ambient noise levels by more than 5 dBA. Site preparation for these facilities would be completed in three or four intermittent two-day periods over the ten-month period. Construction of each facility would only affect any one receptor along Dellbrook Avenue for no more than approximately two to four days and projected maximum noise levels would exceed the speech interference criterion by 1 dBA.

Nonetheless, the Draft EIR acknowledges that these noise levels constitute a significant impact. Mitigation measures recommended in **Chapter 4.0** of the Draft EIR would reduce predicted noise impacts to a less-than-significant level. In addition, following mitigation measure has been added to the Draft EIR:

> [p. 4.0-3, new number 9] "9. The project sponsor shall delay usage of heavy impact equipment such as jackhammers to 8:00 AM."

It is not feasible to delay the start of construction activities until 9:00 AM since that would push the end of the construction day to 5:30 PM which, during late fall and winter, would be after dark.

Also, as shown in **Table 3.4-3** on p. 3.4-10 of the Draft EIR, construction noise levels at the residences along Dellbrook Avenue would be substantially lower during the remainder of the proposed eight-year construction period and would not exceed the speech 80 dBA interference criterion. Although construction noise levels would exceed the ambient noise levels by 5 dBA or more, which would result in a noticeable noise increase, the impacts would be less than significant. The impacts would be reduced with implementation of the mitigation measures stated on p. 4.0-2 to p. 4.0-3 of the Draft EIR.

Comment 59

"The construction staging and parking area—with attendant generator, work and traffic noise—within feet of the backyards of the 000-100 block of Dellbrook must be moved to a less intrusive area." **Anne and Timothy Poirier**

"I found out last night, which particularly concerns me, that there is a temporary power plant that is planned to be put essentially in my backyard. It could not be closer to the property lines of the Dellbrook Avenue corner properties. And it is not included in the environmental impact report at all because it is only a temporary facility. However 'temporary' on a 10-year construction project means it will be there until my children are in college. That is not, to me, 'temporary.'" **Deborah Wald, Planning Commission public hearing comments, January 10, 2002**

Response 59

During project construction, an emergency generator (temporary power plant) is proposed to be located approximately 110 feet southwest of the nearest property line on Dellbrook Avenue (please see revised project phasing plans, Phase B, in **Appendix 2.0-2** of the EIR, included in **Chapter 5.0**, of this comments and responses document). However, this generator would only operate under emergency conditions, such as power failures. Regular operation of this generator would be limited to a 30-minute test once a week in accordance with State requirements. Because of new switching equipment that would be ordered with the generators, the timing of when the test would occur would be flexible and would be done at the time of day that is least disruptive to the adjacent Dellbrook Avenue neighborhood. For example, a loud siren is heard every Tuesday at noon. This may be a good time for the hospital to test the emergency generator. If the generator is located 110 feet from the nearest property line, the generator noise would reach 55 dBA at the property line and would be slightly higher than the existing 54 dBA (Leq) daytime ambient noise level in this neighborhood. Based on the projected noise level, a 30-minute test once per week would not increase daytime ambient noise levels. Under emergency conditions, the degree of impact would depend on the time of day the generator is operated and duration of operation, since ambient noise levels are lower at night than during the day. It should also be noted that the existing emergency generator is currently tested once per week before 7:00 AM. No large construction-related trucks would enter this area, only construction worker vehicles.

Comment 60

"Hours of operation for demolition and exterior construction should be limited to Monday to Friday from 8 AM to 5 PM to decrease the proposed intolerable noise levels to a reasonable timeframe." **Anne and Timothy Poirier**

Response 60

The San Francisco Noise Ordinance specifies that construction hours shall be limited to between 7:00 AM and 8:00 PM. The hours of construction for the proposed project would be between 7:00 AM and 3:30 PM and, therefore, would comply with the Noise Ordinance. However, the project sponsor has agreed to delay the usage of heavy impact equipment such as jackhammers to 8:00 AM (refer to **Response 58**). As a consequence, those shifts would end at 4:30 PM.

Comment 61

"Therefore I believe that there are a number of similar situations that need to be addressed regarding noise, regarding the amount of dust and debris that will be created in our neighborhood, the impact on the green space around our homes." **Deborah Wald, Planning Commission public hearing comments, January 10, 2002**

Response 61

Please refer to **Response 1** for a discussion of construction-related impacts on open space areas; **Responses 13** and **14** for a discussion of public access to open space areas during construction; **Response 64** for a discussion of cumulative construction-related noise impacts; and **Response 83** for a discussion of construction-related air quality impacts.

Off-site Construction Traffic Noise

Comment 62

"p. 3.4-21 D(2) Off-site Construction Traffic Noise – This section states 'Although cut and fills would be balanced on site, trucks would need to haul building materials to the campus'. The text does not address the potential need for trucks to cycle off-site due to limitations of internal site access roads. The Draft EIR should therefore stipulate project requirement that all grading and other operations involving the cycling of trucks, will limit truck and vehicles movements to on-site routes. No off-site cycling of trucks or vehicles will be allowed." **Eileen Fanelli**

Response 62

Construction trucks moving equipment and construction materials within the project site will be limited to the confines of the site. The project sponsor will develop a traffic plan later in the project's planning

process that will detail the routing of large trucks through the campus during project construction. Please see Response 48 for a discussion of the on-site cycling of trucks.

Operational Noise

Comment 63

"Noise—As is well documented in the draft EIR, Laguna Honda Hospital is surrounded on two sides by residential neighborhoods. Noise is a pollutant of every city. While the EIR discusses construction noise, it does not fully discuss building noise. The EIR should include an analysis of the existing noise sources on the site, with a commitment not to increase noise levels and if possible decrease noise in the future buildings. This is especially important since the newly constructed buildings will not doubt have 'climate control.'" **Pinky Kushner**

"The operational noise, it's going to make a bowl. If you look at the shape of the way this is going to be built, it focuses all the noise from generators, from any vehicles that drive, will be reflected off the faces of the buildings towards the hill. The sound also rises, which means it's going to go right in the back of our houses as it does now." **John Paul, Planning Commission public hearing comments, January 10, 2002**

"As far as the other environmental impacts here, as far as being a good neighbor, the noise that they generate presently, they admitted last night that the generators do not muffle the noises presently but the new ones will. I disagree. I don't think they will. They also have a steam plant, the pressure blow offs which will be done on a regular basis. The noise -- in fact one gentleman admitted that he has double-insulated windows on the back of his house and they go right through the double-insulated windows. The gentleman is also hard of hearing." **John Paul, Planning Commission public hearing comments, January 10, 2002**

Response 63

Operational noise impacts were evaluated in the Initial Study (**Appendix 1.0** of the Draft EIR) and were found to be less than significant. The commentor is correct in that the project would include "climate control" equipment. As disclosed on p. 22 of the Initial Study, the project would include mechanical equipment, such as air conditioning units and chillers, which could produce operational noise. However, these operations would be subject to the San Francisco Noise Ordinance, Article 29 of the San Francisco Police Code. Code compliance would ensure that proposed building equipment would not result in substantial increases in ambient noise levels. This also applies to operation of the proposed interim electrical facility.

Regarding the "bowl" effect of concern to the commentor, the existing noise environment is influenced primarily by the local topography as well as the existing locations of noise sources. Sound waves spread spherically in the air from a noise source, decreasing with distance. The rate of attenuation depends upon source configuration and source-emission characteristics. On city streets, noise levels decrease at a rate of approximately six decibels per doubling of distance. This rate applies to noise traveling vertically (upward) as well as noise traveling horizontally over land. In addition to reductions due to distance, sound levels are further attenuated when sound paths lie close to vegetation-covered ground. Attenuation can be as much as five decibels over several hundred feet.

Existing topography will influence the future noise environment, just as it has influenced the existing noise environment. Noise attenuation rates could also be influenced by the reflection effects of buildings. Shielding effects of topography have been accounted for in Tables 3.4-3 through 3.4-8 in the Draft EIR; such effects are accounted for in the applicable tables as "Barrier Adjustment." The effect of noise reflection off building surfaces will vary with the orientation of the building façade relative to the location of the noise source and receiver. Given the variable nature of local topography, building orientations, and noise reduction and reflection effects on the project site, potential noise level changes would vary from one location to another. However, given that the proposed project would not result in a different use of the site, operational noise levels from the proposed project would be similar to the existing noise levels.

Future noise from solid waste collection is expected be similar to existing conditions. Also, it was determined that noise levels associated with materials handling at loading docks would not be substantially above ambient noise levels. Therefore, all operational noise impacts are expected to be less than significant and not substantially different than present conditions.

Cumulative Impacts

Comment 64

"Therefore I'm very very concerned about the actual construction process and the impact it's going to have on the quality of life of my family and my neighbors, all of whom are homeowners in that neighborhood. As I'm sure you all know, the neighborhood did support Laguna Honda Hospital, the project to rebuild Laguna Honda Hospital, and we come here in a spirit of wanting to work together. However we have some grave concerns about the noise issues and particularly want to make sure that they are being addressed with regard to the YGC construction and the reservoir construction. We have three major construction projects going on in a quite small residential neighborhood simultaneously, and

I have not heard the cumulative impact of those three projects happening simultaneously addressed anywhere." **Deborah Wald, Planning Commission public hearing comments, January 10, 2002**

Response 64

Cumulative noise impacts associated with construction of the proposed project and the Youth Guidance Center Juvenile Hall Replacement project are discussed in **Section 3.4.E, Construction Noise, Cumulative Impacts** (p. 3.4-22 of the Draft EIR). That discussion, however, did not include the Sutro Reservoir and Pipeline project. As indicated below, there would still be no significant cumulative noise impacts associated with the overlap in construction of the Laguna Honda Hospital Replacement project, the Youth Guidance Center Juvenile Hall Replacement project, and the Sutro Reservoir and Pipeline project. The cumulative noise impact discussion in the Draft EIR is hereby revised as follows:

> [p. 3.4-22, third paragraph] "Cumulative construction noise impacts could ~~occur~~ result if ~~another project occurs~~ construction of other projects occurs in the vicinity of the Laguna Honda hospital at the same time. Two projects in the project vicinity with construction activities that would overlap with proposed project construction are the Youth Guidance Center (YGC) Juvenile Hall Reconstruction Project ~~is located~~(located immediately southeast of the project site) and the Sutro Reservoir and Pipeline Project (located north of the site)."
>
> [p. 3.4-23, added after last paragraph] "With respect to the Sutro Reservoir and Pipeline Project, reservoir improvements are scheduled to occur from March 2002 to September 2003. Reservoir improvements would include installing new dedicated reservoir inlet piping, repairing reservoir roof and joists, cleaning, and miscellaneous improvements. Most activities would be confined to the reservoir site, which is located at the northeast corner of Clarendon Avenue and Olympia Way. The pipeline project consists of the third and final phase of construction of the Sutro Reservoir inlet pipeline. Construction will occur from Sloat Boulevard (at 23rd Avenue) to Dewey Boulevard (southwest of the Laguna Honda hospital property), where it will connect to the pipeline already constructed during phases I and II. Therefore, no additional pipeline construction will occur in the immediate project vicinity along Laguna Honda Boulevard, Clarendon Avenue, or Olympia Way.
>
> Reservoir improvements would overlap with Phase One of the proposed project, which is scheduled for completion by Fall 2003. Phase One of the proposed project would involve utility construction on the project site, with the noisier activities limited to three or four two-day periods. Phase One utility construction on the project site would primarily affect Dellbrook Avenue residents and hospital receptors, while reservoir improvements would primarily affect the Clarendon Avenue/Olympia Way residents. Topography and

distance would help reduce reservoir construction noise at the Dellbrook residents most affected by project construction. However, cumulative noise increases could result if any construction activities occur on the exterior of the reservoir during the three or four two-day periods when project utility construction also would occur. The short timeframe (a total of six to eight days) and short duration of each utility project (two days) would minimize the potential for significant cumulative noise impacts on the Dellbrook Avenue residents due to these two projects. Therefore, the project would not result in any significant cumulative noise impacts.

Although Phase Two of the proposed project and reservoir improvements would both affect the Clarendon Avenue/Olympia Way neighborhood, these two construction phases would not occur at the same time. Therefore, cumulative construction noise impacts on this neighborhood due to these two projects would not be anticipated. The Sutro Reservoir and Pipeline project would occur at the same time as Phase One of the YGC project. Since existing topography would isolate the two construction projects from each other, each project would affect different receptors. Therefore, cumulative noise impacts on any particular receptor would not be anticipated."

3.5 HISTORIC ARCHITECTURAL RESOURCES

Evaluation of Historical Significance

Comment 65

"3.5 Historic Architectural Resources – The Landmarks Board concurs that the Laguna Honda complex is eligible for the National Register of Historic Places as an historic district under Criterion A, and that the Main Hospital Building and Clarendon Hall are individually eligible for listing under Criterion C." Tim Kelley

Response 65

The Landmarks Board's comment that the Laguna Honda complex is eligible for the National Register of Historic Places as an historic district is acknowledged.

Impacts of the Proposed Project

Comment 66

"We believe the historic architectural significance of the current buildings should be considered and preserved. Redevelopment and seismic upgrades should be within current historic building structures." Anne and Timothy Poirier

Response 66

As described on p. 6.0-1 of the Draft EIR, under subsection A1., Alternatives Considered But Not Brought Forward for Detailed Analysis, the preservation of the Main Hospital Building and Clarendon Hall was considered. As stated on p. 6.0-2 and p. 6.0-3 of the Draft EIR, the Office of Statewide Health Planning and Development (OSHPD) is responsible for overseeing all aspects of hospital construction in California, including remodeling and retrofitting existing buildings. OSHPD requires documentation and inspection during construction of compliant buildings. Since construction records are not available for the Main Hospital Building and Clarendon Hall, destructive testing would be required to verify that the buildings were completed in exact conformance with the blueprints. This requirement makes remodeling the existing buildings for skilled nursing use extremely expensive and therefore infeasible.

As described in Chapter 6.0, Alternatives to the Proposed Project, all three alternatives analyzed in detail include partial preservation of the historical buildings. Alternative One would retain and rehabilitate Clarendon Hall as an assisted living facility and would retain and rehabilitate portions of the Main Hospital Building, including Wings A, B, C and H, for administrative purposes. Alternative Two would retain and rehabilitate portions of Wings A, B, C and H of the Main Hospital Building for administrative use, and Wings D, E and K and portions of Wings F, G and L as an assisted living facility. Alternative Three would retain and rehabilitate portions of Wings A, B, C and H of the Main Hospital Building for administrative use, and retain and rehabilitate Wings K and M and portions of L and O of the Main Hospital for use as an assisted living facility and childcare facility.

3.6 HAZARDS

Soil and Groundwater Contamination

Comment 67

"The dump site in the northern part of the Open Space area, referred to under item 4.2, above, is located outside the limits of construction. Therefore, it is not included in the area proposed for Hazard

Mitigation Measures per Section 4-D (p. 4/0-11) which limits such measures to '...areas...subject to ground disturbance during site development activities...' The area of that dump site, as well as any other areas on the campus-whether inside or outside the construction perimeter-which are known or suspected to have been contaminated need to be added to the list of areas to be sampled." **Gilbert De La Mora, *et al.***

"The abandoned garbage dump to the north—including broken glass, rusted metals, and medical waste—must be evaluated and cleaned up. This is a dangerous area for the public, yet a public trail passes right through the middle of it. Remediation of soil and water quality might be necessary." **Anne and Timothy Poirier**

"The rubble dump behind the 000 block of Dellbrook should be restored to meadow for public use as quickly as possible." **Anne and Timothy Poirier**

"There is an existing medical waste dump on the Laguna Honda site that has not been mentioned in the Draft EIR. The dumpsite appears to be old and is partially covered with blackberry vines. A site inspection will show large fields of glass bottles, medicine bottles, bedpans, and a tremendous assortment of related hospital waste. The dump is extensive and appears in some places to be very deep. The dump is spread out from the top of the hill that borders the Clarendon Hills West, the Clarendon Hills East building and continues along the Clarendon West parking lost (see diagram). The dump continues down into the valley located between Clarendon Avenue and Clarendon Hill and goes into a dry riverbed.

The Draft EIR is incorrect when it states on p. 3.6-8 'Furthermore, there are no past, present, or reasonably foreseeable future projects in the project vicinity that are anticipated to result in impacts associated with hazardous building materials or soil and groundwater contamination that could affect the project site.' The existing medical waste dump adjacent to the project could easily have a cumulative impact on hazardous building materials, soil and groundwater contamination. The EIR must consider the environmental hazards represented by the old medical waste dump.

The medical waste dump must be subject to the same mitigation rules that govern the entire Laguna Honda site for the following reasons:

Although boundary modifications between the 80-D and open spaces districts have not been determined, I believe that at least part of the old medical dump will fall inside the project boundaries.

Some of the aggregate from demolished buildings will probably come into contact with the medical dumpsite.

As the EIR states in Section 3.6-7-E4, 'There is also a possibility of encountering contamination in areas not previously suspected to be contaminate. Disturbance of contaminated areas could expose

construction workers, employees, residents, or visitors to these substances, which could result in adverse health effects if exposure were of sufficient quantities.'

Good sense dictates that public 'open spaces' should not be left in a contaminated state. What good is 'open space' that the public cannot visit or use safely?" George Wooding

Response 67

The commentor is correct in that the Draft EIR does not mention the debris area in the northern portion of the campus (the area referred to by the commentors). Although this debris pile is within the property boundary, it is not within the limits of construction and not within the "project area." Implementation of the proposed project would not result in indirect impacts to construction workers and future users of the project associated with the debris pile.

The debris on the northern portion of the campus is currently being removed as a separate action. Soils in this area were sampled to determine if the soil is contaminated by the contents of the debris that were deposited there. Analyses were performed for volatile organics, semi-volatile organics, organochlorine pesticides, and the California list metals. All but the metals were below detectable levels, and all the metals were well below the California standards for determination of hazardous waste. Although chromium was detected at more than 10 times the Soluble Threshold Limit Concentration, the concentration is within the normal range found in native soil of this area. The findings of the letter report, dated February 7, 2002, by the City and County of San Francisco, Department of Public Health, Occupational and Environmental Health, indicate that the soils on the campus are not contaminated. The Department of Public Health, Occupational and Environmental Health, reviewed the letter report prepared on the soil analysis and concurred with the findings.

Chapter 3.6, Hazards, of the Draft EIR addresses the potential impacts associated with hazardous building materials, hazardous materials use and storage, hazardous waste generation and storage, and soil and groundwater contamination that may result from implementation of the proposed project. The Draft EIR determined that asbestos-containing materials are present on site and lead-based paint is likely to be present. Site records indicate the potential former presence of up to three incinerators. Hazardous materials releases may have occurred in the vicinity of the incinerators. Historical and existing underground storage tank locations were identified that may be sources of potential contamination. For this reason, the project sponsor has agreed to include mitigation measures to prevent the exposure of contaminated soil to construction workers, employees, residents, or visitors (as stated on p. 4.0-11 of the Draft EIR). These measures include the conducting of a Phase II Assessment, if necessary, to ensure that all areas of suspected surface and subsurface contamination subject to ground disturbance during site development activities are sampled. If contamination is detected in the sampling, the contaminated area would be remediated in accordance with the standards, regulations, and determinations of local, state, and federal regulatory agencies. In addition, a Site Health and Safety Plan would be prepared prior to

remediation pursuant to California Division of Occupational Safety and Health (Cal-OSHA) requirements and National Institute for Occupational Safety and Health guidance to ensure worker safety. The project sponsor has also agreed to coordinate with the San Francisco Department of Public Health's Local Oversight Program if underground storage tanks are discovered during ground-disturbing activities. Lastly, all reports and plans prepared in accordance with the above measures and the measures identified in **Chapter 4.0, Section D., Hazards**, would be provided to the San Francisco Department of Public Health and any other appropriate agencies identified by the Department of Public Health.

Comment 68

"p. 1.0-8: B6 Hazards: The text indicates that soil contamination has been identified on site. Where is it relative to proposed building footprints and construction areas?" **Eileen Fanelli**

Response 68

As stated in **Section 3.6, Hazards**, on p. 3.6-7 of the Draft EIR, suspected areas of soil contamination are those areas where the two outside incinerators and the former underground storage tanks (USTs) were located. One of the former incinerators was located to the east of the proposed Link Building and south of the proposed childcare playground. The other outdoor incinerator was located to the east of the proposed new Clarendon Hill East Building. Most of the former USTs were located between the proposed new Link Building, the proposed new greenhouse, and the childcare playground. The existing USTs are also in this vicinity of the project site.

Comment 69

"The Department of Toxic Substances Control (DTSC) is in receipt of the environmental document identified above. Based on a preliminary review of this document, we have determined that additional review by our regional office will be required to fully assess any potential hazardous waste related impacts from the proposed project. The regional office and contact person listed below will be responsible for the review of this document in DTSC's role as a Responsible Agency under CEQA and for providing any necessary comments to your office:

Barbara Cook
Site Mitigation Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710

If you have any questions concerning DTSC's involvement in the review of this environmental document, please contact the regional office contact person identified above." **Guenther W. Moskat**

Response 69

The City and County of San Francisco Planning Department contacted Barbara Cook to determine whether DTSC would be providing additional comments. Ms. Cook responded that DTSC had no further comments on the Draft EIR.[11]

CUMULATIVE IMPACTS

Comment 70

"And as I said, I'm very concerned about -- I don't see an analysis anywhere of how this project will interplay with the YGC and reservoir project in terms of noise level; in terms of traffic; in terms of, as I say, dust and debris. I know that there's substantial hazardous waste on the site, in terms of like paint and in terms of asbestos; and how our neighborhood will be protected from this level of construction all around us is a grave concern to me." **Deborah Wald, Planning Commission public hearing comments, January 10, 2002**

Response 70

Please see **Responses 50, 64,** and **83** for discussions of cumulative construction-related traffic, noise, and air quality impacts. Also, please see **Responses 67** and **83** for a discussion of containment of on-site hazards and removal of asbestos-containing materials.

4.0 MITIGATION MEASURES

General

Comment 71

"By definition and in effect, Construction Noise is limited to certain times of the construction period; conversely, visual quality, use of open space, hazards, and cumulative traffic affect now, and will affect, the quality of life both during the 8-year construction period and the time after the project is completed.

---

11 Gibson, Lisa, San Francisco Planning Department, personal communication, January 24, 2002.

"Given the more elevated location of the homes there, the project sponsor needs to mitigate this avoidable visual impact by planting, in the gap and west of the boundary, fast growing, tall trees (e.g., conifers) and shrubbery. That needs to be done not 'prior to final project completion' (p. 1.0-9, and p. 4.0-1) but during Week 1 of Phase A of Phase One." **Gilbert De La Mora, *et al.***

Therefore, we urge you to take the broad view in these three categories not only in terms of population segments affected, but also the range of time frames. In other words, where visual and use of open space problems exist already on day one of the project, mitigation needs to begin then rather than at the end of the semi-permanent construction period. And where long traffic delays and safety hazards and cumulative volumes contributed to by project-generated automobile traffic, mitigation needs to begin at the earliest possible time." **Gilbert De La Mora, *et al.***

Response 71

The commentor is correct that the effectiveness of a given mitigation measure depends in part of the timing of implementation of that measure. The timing should be such that the associated significant effect is reduced to below a significant level or is avoided altogether.

Pursuant to CEQA, a Mitigation Monitoring Report Program (MMRP) would be developed for the proposed project (CEQA *Guidelines* Sections 210816(a), 15091(d), and 15097). According to the *Guidelines*, when an EIR identifies significant effects, the lead agency must also adopt a program for reporting or monitoring mitigation measures that were adopted or made conditions of project approval. The monitoring program is implemented to ensure that the mitigation measures and project revisions identified in the EIR are implemented.

The MMRP to be prepared for the Laguna Honda hospital project will include the person(s) responsible for implementation of the mitigation measures. (As stated on p. 4.0-1 of the Draft EIR, the project sponsor is responsible for implementing and has agreed to all the mitigation measures presented in the EIR.) The Mitigation Monitoring Report will also identify how the measure will be implemented, monitoring responsibility, and monitoring schedule. Details regarding the timing of mitigation measures will be presented in the Mitigation Monitoring Report and are not required in the Draft EIR.

The MMRP is simultaneously being prepared with the Final EIR. The MMRP will be adopted by the Planning Commission as part of their motion for approval of the Conditional Use Permit and other project approvals, should the Commission approve the proposed project.

The majority of the mitigation measures described in **Chapter 4.0** of the Draft EIR identify when the mitigation would be implemented. To illustrate, the mitigation measures for impacts to visual quality (Mitigation Measures A1 through A4, p. 4.0-1 of the Draft EIR) require a roofing design and color treatment approval by the Planning Department Environmental Review Officer and the Civic Design

Review Committee prior to issuance of a building permit. Another example is the hazards mitigation (Mitigation Measures D1 through D6, p. 4.0-11 through p. 4.0-13 of the Draft EIR) which state that surveys need to be conducted prior to demolition and excavation activities.

In regard to Visual Quality Mitigation Measure 1, the significant impact the trees are intended to mitigate (the presence of new buildings on the hospital campus) would not occur at the beginning of construction. Trees do not need to be planted at the beginning of the construction period in order for the mitigation measure to be effective. It is normal and expected that landscaping on construction sites needs time to grow and become established. Furthermore, some of the general concerns cited by the commentor (such as traffic impacts to private views) are not identified as significant impacts in the Draft EIR, and do not require mitigation.

However, implementation of some of the mitigation measures can begin at an earlier period than is indicated in the Draft EIR. Therefore, the Draft EIR is hereby revised as follows:

> [p. 4.0-1, Section A. Visual Quality, Mitigation Measure 1, third sentence] "The planting shall occur during landscaping of the area east of the Link Building as early as feasible during the construction phase~~and prior to final project completion~~."
>
> [p. 4.0-1, Section A. Visual Quality, Mitigation Measure 4, third sentence] "These features of the project design shall be implemented at the earliest extent feasible during the construction period and shall be included in the final project plans to be completed prior to issuance of the building permit."
>
> [p. 4.0-11, Section 3.6. Hazards, Mitigation Measure 2, first sentence] "2. Prior to any demolition or excavation at the project site, ~~T~~the project sponsor shall conduct one or more Phase II Environmental Site Assessments of the project site, as necessary, to ensure that all areas of suspected surface and subsurface contamination subject to ground disturbance during site development activities are sampled."
>
> [p. 4.0-12, Section 3.6. Hazards, Mitigation Measure 5, new sentence prior to last sentence] "This determination shall be made at the earliest extent feasible during the construction period."

Comment 72

"Also, a determination needs to be made as to the extent to which the needed mitigation measures are within the scope of the project or within the responsibility of (other) public agencies. (See p. 4.0.1.)" **Gilbert De La Mora, *et al.***

Response 72

The project sponsor is responsible for the implementation of all the mitigation measures in the Draft EIR. In order to clarify this, the Draft EIR is hereby revised as follows:

> [p. 4.0-1, first paragraph, third sentence] "~~Implementation of some measures may be the responsibility of public agencies.~~"

Comment 73

"The mitigation section does not provide detail on how mitigations will be documented or enforced. This is a major weakness in the text and needs to be addressed. Specifically, whether mitigations are included in project plans and specifications or other document, who is responsible for approval or oversight of the mitigations (contractor and/or City staff), how compliance will be documented, and consequences of non-compliance need to be included." **Eileen Fanelli**

"p. 4.0 Mitigation Measures – General comment, this section should outline the necessary prohibitions on parking, traffic routes, on-site cycling of construction vehicles, etc. The section should also specify how these measures will be enforced, what provisions will be included in the project specification, what measure require completion of separate plans and documents, who will approve those plans and documents, and the timing of that approval relative to issuance of building permits and contractor notices to proceed." **Eileen Fanelli**

"p.1.0-10: Construction Noise: Who will conduct the noise monitoring outlined as a mitigation measure, the contractor, City or third party? Who will determine if feasible measures have been implemented? Is a noise abatement plan required of the contractor? Who will approve it and monitor its implementation? How will work be coordinated with the hospital staff? Who will be responsible, the City or the Contractor?" **Eileen Fanelli**

Response 73

Please refer to **Response 71** for a discussion of the project's MMRP, a program for reporting and monitoring mitigation measures that are adopted or made conditions of project approval. CEQA requires that for each significant impact identified in the EIR, the EIR must discuss feasible measures to avoid or substantially reduce the project's significant environmental effect. The Draft EIR does not identify significant impacts related to transportation and circulation. Therefore, mitigation measures addressing prohibitions on parking, traffic routes, on-site cycling of construction vehicles, etc. are not required to be included in **Chapter 4.0** of the Draft EIR.

Comment 74

"In keeping with the Transit First Policy, we ask that Laguna Honda Hospital's Plan offer mitigation for its effects on City traffic and congestion by reducing the number of planned parking spaces to the Planning Code's general recommendation for this sort of facility, 294 spaces." **Pinky Kushner**

Response 74

Please refer to the discussion of City *Planning Code* requirements on p. 3.2-21 through 3.2-22 of the Draft EIR. Based on this discussion, a *minimum* of 294 parking spaces would be required by the Planning Code. Under Section 204.(c) of the San Francisco *Planning Code*, 150 percent of the required number of spaces provided by the project could be allowed as an accessory use, for a total of 441 spaces. The proposed project would provide 655 parking spaces, 114 more parking spaces than allowed as an accessory use by the *Planning Code*. As stated on p. 3.2-22 of the Draft EIR, the project sponsor would request a Conditional Use authorization "for parking for a specific use or uses, where the amount of parking provided exceeds the amount classified as accessory parking in Section 204.5..."In reviewing the request for a Conditional Use authorization, the Planning Commission will consider criteria set forth in Section 157 of the *Planning Code*, including demonstration that the demand for additional parking cannot be satisfied "by the amount of parking classified by this Code as accessory," and "by more efficient use of existing on-street and off-street parking available in the area." The parking impact analysis discussion on p. 3.2-19 and 3.2-20 of the Draft EIR indicates that the 655 on-site spaces would be necessary to meet the parking demand of the proposed project and that on-street parking to meet this total demand is unavailable.

The City's Transit First Policy (Section 16.102 of the City Charter) is defined by a broad set of six principles which collectively state that public transit is an economically and environmentally sound alternative to the private automobile, and that facilitating the use of public transit should be a priority in conducting and implementing all City programs, polices, and affairs. As discussed on p. 3.2-17 and p. 3.2-18 of the Draft EIR, the proposed project would not have a significant effect on traffic conditions and intersection operations and, therefore, no mitigation measures would be required under CEQA. In keeping with the City's Transit First Policy, Laguna Honda hospital recently developed a Transportation System Management Program (TSMP), the goal of which is to minimize single-occupancy vehicle trips generated by the hospital. The TSMP would reduce parking demand by encouraging the use of transit and bicycles, and alternative modes of transportation such as participation in rideshare and carshare programs. Please refer also to **Response 44** concerning Laguna Honda hospital's TSMP.

Visual Quality

Comment 75

"p. 4.0-1: 'A. Visual Quality' Mitigation measure #1 (Site Landscaping) refers only views from Twin Peaks Park. This would appear inadequate if the project includes improvements to access along Woodside and Laguna Honda Blvd." **Eileen Fanelli**

Response 75

CEQA requires that for each significant impact identified in the EIR, the EIR must discuss feasible measures to avoid or substantially reduce the project's significant environmental effect. As discussed on p. 3.3-3 of the Draft EIR, three viewpoints of the project from publicly-accessible areas near the site were selected for analysis. The viewpoints were determined by the San Francisco Planning Department staff to provide representative views of the site from off-site locations. The selected viewpoints provide both short-range and long-range views. The viewpoints selected include views of the project site from Laguna Honda Boulevard, Edgehill Way, and Twin Peaks Park. However, the only public viewing area generally recognized as providing scenic views of the project site is Twin Peaks Park. The other two publicly-accessible viewing areas are presented in the Draft EIR for informational purposes only.

The Draft EIR identifies a significant impact associated with the view of the project site from Twin Peaks Park, not views from Woodside Avenue or Laguna Honda Boulevard (see refer to **Responses 51** and **54** for a discussion on the Draft EIR's findings regarding visual impacts). For this reason, mitigation measures have been developed to reduce the impact to a less than significant level. Please refer to **Response 5** for a description of the proposed landscaping plans.

Comment 76

"We ask that not only should the new construction be sensitive to incidental light, but also that the EIR pledge to keep as much of the grounds in darkness as possible for foraging owls. (It may be advisable to consult a ornithologist; we, however, are not insisting on this.)" **Pinky Kushner**

Response 76

Most construction activities would generally occur during the daylight hours, between 7:00 AM and 3:30 PM. The usage of heavy impact equipment such as jackhammers, will begin at 8:00 AM and continue to 4:30 PM. In the winter months, there may be a need for lighting during the first hour of the workday. However, construction would occur in the developed area of the campus where artificial lighting already exists (see **Figure 2.0-4** for the limits of construction). Construction would not occur in the open space

area, and thus, lighting associated with construction activities would have minimal effects on wildlife in that area.

In order to clarify the proposed lighting fixtures for the project, the Draft EIR is hereby revised as follows:

> [p. 3.3-13, second paragraph] "~~In addition, t~~The proposed lighting fixtures would be designed to minimize glare and off-site impacts. Low-profile, low intensity lighting would be installed and directed downward to minimize light and glare. All lighting adjacent to the open space area would be downcast luminaries with light patterns directed away from the natural areas. Given ~~this features of the project and the above discussion~~ the above, visual impacts associated with the introduction of and increase in light sources are considered less than significant."

Comment 77

The forests abutting Panorama, Dellbrook, Olympia and Clarendon must be attended to immediately. Additional trees must be planted before the project begins to provide ample time for the growth of these natural view and sound barriers. **Anne and Timothy Poirier**

Response 77

Please refer to **Response 71** for a discussion regarding the timing of implementation of mitigation measures. The proposed project would not impact any trees outside the limits of construction, identified in **Figure 2.0-4** of the Draft EIR. Tree removal would occur mainly in the central valley area of the project site and not in areas generally visible by the surrounding neighborhoods. Replacement trees would be planted, including a tree buffer on the eastern campus perimeter (along Dellbrook Avenue), as part of the landscaping plan (see **Response 5** above) at the earliest extent possible.

Construction Noise

Comment 78

"Hours of operation for demolition and exterior construction should be limited to Monday to Friday from 8 AM to 5 PM to decrease the proposed intolerable noise levels to a reasonable timeframe." **Anne and Timothy Poirier**

Response 78

Please see **Response 60** for a discussion of limits on construction hours.

Comment 79

"We request that the list of persons to receive the advance notifications giving them the name and phone number of the Designated Complaint Coordinator (mentioned on p. 1.0-11 and 4.0-3) include, as a minimum, all residents living at locations at which the mitigated construction noise is expected to exceed the ambient noise level, during a given phase, by 5 dBA or more. We further request that this Coordinator also be similarly responsible for monitoring compliance with the guidelines established by the BAAQMD, especially to ascertain that levels of wind-blown dust are well below threshold levels. (See p. 4.0-13.)" **Gilbert De La Mora, *et al.***

p. 4.0-2,3 'B. Construction Noise' the text states 'During all construction phases, there shall be close coordination between construction staff and hospital staff'. THERE IS NO MENTION ABOUT THE RESIDENCES. A mitigation should include specific measures to address noise impacts to the community (Dellbrook and others) in the form of regular meetings, contact persons with the City and Contractor staff, etc." **Eileen Fanelli**

"Now under the Construction Noise it states, quote: During all construction phases there will be close coordination between the construction staff and hospital staff. There's no mention about the residents here. We would like specific measures to keep the community, the residents in the community, informed, like maybe biweekly or monthly meetings." **Richard Parrino, Planning Commission public hearing comments, January 10, 2002**

Response 79

The project sponsor agrees with the first part of the above comment. The Draft EIR is hereby revised as follows:

> [p.4.0-3, Section B. Construction Noise, Mitigation Measure number 8] "8. A designated complaint coordinator shall be responsible for responding to noise complaints during the construction phase. Residents living at locations where the mitigated construction noise level is expected to exceed the ambient noise level, during a given phase, by 5 dBA or more would receive advance notifications that would provide the name and number of the designated compliant coordinator. The name and phone number of the complaint coordinator shall also be conspicuously posted at construction areas and on all advanced notifications. This person shall maintain a log of complaints received and take steps to

resolve complaints, including periodic noise monitoring, if necessary, to ensure that significance thresholds are not exceeded by project construction activities."

In response to the part of the comment that addresses monitoring compliance for air quality impacts, BAAQMD does not require a designated complaint coordinator to monitor compliance with their guidelines. However, the MMRP that will be prepared for the Laguna Honda hospital project will contain information on how Air Quality Mitigation Measure 1 (p. 4.0-13 of the Draft EIR) will be implemented and enforced.

Historic Architectural Resources

Comment 80

"p. 1.0-13: C3 Historic Architecturally Resources, 2): How will salvage operations be sequenced with the demolition? Who will be responsible, the contractor or a third party?" **Eileen Fanelli**

Response 80

The commentor is referring to a summary of the Historic Architectural Resources Mitigation Measure 2 fully described on p. 4.0-10 of the Draft EIR. Prior to demolition, the contractor and a City-approved architectural historian would identify building features that can be feasibly salvaged. The features would be identified on the demolition plans. A salvage contractor would remove the features to be saved prior to the start of demolition activities.

Comment 81

"4.0 Mitigation Measures – The Landmarks Board generally concurs with the mitigation measures proposed for the loss of historic resources. However, the Landmarks Board believes the following should also be included as further mitigation: Further research should be done regarding the social history of the people housed and employed over the years in those buildings proposed for demolition. The social history of Laguna Honda is not adequately documented in the Draft EIR, nor in the Laguna Honda Hospital Background Report, dated October 2001, which concentrate only on architectural and institutional history.

Historic Photographs showing the social use of the spaces should be included both in the HABS documentation and the on-site interpretive display." **Tim Kelley**

"In conclusion, the Landmarks Board views the proposed loss of important historic resources as extremely significant. However, the Landmarks Board concurs with the necessity for their demolition, and urges the adoption of the additional mitigation measures proposed above." **Tim Kelley**

Response 81

The project sponsor has agreed to the additional mitigation recommended by the Landmark Board as part of the proposed project. The Draft EIR is hereby revised as follows:

> [p. 4.0-10, Section C. Historic Architectural Resources, Mitigation Measure 1 (i), sentence added between sentences two and three] "Research shall be conducted regarding the social history of the people housed and employed over the years in those buildings proposed for demolition."
>
> [p. 4.10-10, Section C. Historic Architectural Resources, Mitigation Measure 1 (ii), first sentence] "Photo-documentation of the property, including the social history and use of the hospital, to Historic American Building Survey Standards."
>
> [p. 4.0-10, Section C. Historic Architectural Resources, Mitigation Measure 1 (iv), first sentence] "An on-site display interpreting the hospital's history and social use of the hospital."

Comment 82

"Landscaping – the Landmarks Board believes that the elements of the existing landscaping throughout the site are important resources and should be protected to the extent possible. The Landmarks Board also urges the project include spaces in which future residents may themselves engage in gardening." **Tim Kelley**

Response 82

Please see **Response 5** for a discussion of proposed landscaping, which includes a gardening area for residents.

Hazards

Comment 83

"Building demolition and removal of asbestos and other hazardous materials should not be done on days with more than 5-mph winds. Flyers should be distributed to homes within 1000 feet with a tentative schedule for these activities so that windows may be closed to reduce intrusion of dust." **Anne and Timothy Poirier**

Response 83

As stated on p. 4.0-13 of the Draft EIR under **Section E. Air Quality** (Section II.B.6 of the Initial Study), the project sponsor has agreed to include mitigation measures that would reduce construction-related air quality impacts, including dust control. These measures are in accordance with the BAAQMD *CEQA Guidelines*. Specific measures that would reduce the generation of dust include the following: the project shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand, or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions. In addition, the demolition, renovation, or removal of asbestos-containing building materials is subject to the limitations of the BAAQMD Regulation 11, Rule 2: Hazardous Materials' Asbestos Demolition, Renovation and Manufacturing. Section 11-2-303 of Rule 2 details the requirements for demolition, renovation, and removal. Section 11-2-303 of Rule 2 details the requirements for demolition, renovation, and removal. The project sponsor will be required to comply with this regulation.

Comment 84

"p. 1.0-14,15: Hazards: The test indicates that sampling and remediation will be completed in areas where contamination is suspected prior to construction. Who will do this and when in the work sequence. What is the estimated volume of potentially contaminated soils that could be encountered? What are the suspected contaminants of concern? Where in the text is the description of site geology and groundwater? Are the referenced tanks formally and appropriately closed?" **Eileen Fanelli**

Response 84

Page 4.0-11, **Chapter 4.0, Mitigation Measures, D. Hazards**, Mitigation Measure 2 states that one or more Phase II Site Assessments of the project site shall be conducted prior to any site development activities. It also states that these studies shall be completed by a Registered Environmental Assessor (REA) or a

similarly qualified individual. Please see **Response 73** above regarding the MMRP, which will provide further detail on how adopted mitigation measures will be implemented. The purpose of a Phase II Site Assessment is to determine the extent of groundwater and/or soil contamination. It is impossible to determine, "...the estimated volume of potentially contaminated soils that could be encountered [on the project site]" until the site assessment(s) has been conducted.

Appendix 1.0, Laguna Honda Replacement Initial Study, Notice of Preparation, and Responses provides a description of the project site's geology and groundwater resources on p. 32, 33, and 37. **Chapter 3.6, Hazards** of the Draft EIR provides a description of soil and groundwater contamination for existing conditions and project impacts. As described on p. 3.6-3 to 3.6-7, suspected contamination consists of diesel gasoline (benzene, toluene, ethyl benzene, and total xylenes), gasoline (methyl tertiary-butyl ether [MTBE]), and semi-volatile organic compounds associated with the three incinerators on the project site.

As stated on p.3.6-2 of the Draft EIR, no records are available that document whether the tanks on the campus were removed or abandoned in place. The proper closure of underground and aboveground storage tanks is not a CEQA-related issue. However, if tanks are not properly closed or are abandoned in place a potential for soil and groundwater contamination exists. The latter is considered a CEQA-related issue and as such, was adequately addressed in the Draft EIR. In addition, the Draft EIR provides mitigation measures to ensure that suspected contamination is tested and if necessary treated and removed.

6.0 ALTERNATIVES TO THE PROPOSED PROJECT

Comment 85

"p. 6.0: 'Alternatives to the Project'. All alternatives (p.6.0-13, 6.0-16) address visual quality of new hospital from Twin Peaks Park and Edgehill Way only, not from Woodside Avenue and Laguna Honda Blvd." **Eileen Fanelli**

Response 85

To promote an understanding of ways to avoid or lessen the significant impacts of a project, the *CEQA Guidelines* require a discussion of alternatives to the proposed project. The discussion should focus on those alternatives that would avoid or substantially lessen significant impacts of the project and provide a comparison of merits of each alternative.

The Draft EIR identified that the project would affect views of the project site from Twin Peaks Park. Given the above, the alternatives in **Chapter 6.0, Alternatives,** Partial Preservation Alternative One and Partial Preservation Alternative Two, provide an analysis of the impacts associated with the view from Twin Peaks Park. However, a brief discussion of how the alternatives would affect the views from Laguna Honda Boulevard and Edgehill Way is provided on p. 6.0-11 and 6.0-16 for informational purposes only.

Please refer to **Response 75** for a discussion on the selected viewpoints for the visual quality analysis.

Comment 86

"Alternative access routes from Laguna Honda Blvd. identified in St. John's scoping letter of July 2000, were not addressed in either the initial study or the Draft EIR. These alternatives should be discussed and the basis for their elimination identified." **Eileen Fanelli**

Response 86

Please refer to **Responses 1** and **10** for a discussion of temporary site access during construction.

The commentor uses inaccurate terminology in referring to the St. John's letter as a scoping letter. Although CEQA encourages holding a public scoping meeting as part of the process to determine the scope of the environmental analysis of an EIR, such a meeting was not required for the proposed project.[12] However, when it is done it should be combined with public agency consultation as described in Section 15083 of the CEQA *Guidelines.* The Notice of Preparation (NOP) for the Draft EIR was published on February 3, 2001. Public agencies have 30 days after receiving the NOP to respond. Therefore, in general, a scoping period lasts approximately 35 days. Therefore, comments on the scope of the EIR were to be submitted in writing between February 3, 2001 and approximately March 10, 2001. All scoping letters received in that time period are included in **Appendix 1.0** of the Draft EIR.

St. John's letter of July 2000 assumes the construction of temporary access routes. In addition, the letter suggests that the Initial Study and EIR evaluate widening Laguna Honda Boulevard north of the Forest Hill MUNI station to include a truck turn-out lane allowing large vehicles to properly slow and exit the travel lane as it enters the hospital.

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12 As of January 1, 2002, scoping meetings are required, pursuant to CEQA,"...for all projects of statewide, regional, and areawide significance..." However, because the NOP for the project was issued prior to this date, the project is exempt from this new law.

The project sponsor has coordinated with the Department of Parking and Traffic and has developed feasible haul routes for large trucks accessing the project site during the construction period. As discussed in **Response 1** above, the new driveway on Woodside Avenue would provide an adequate turning radius for large trucks. Given this, the haul routes specified in **Response 10** above would be the most feasible routes for the proposed project.

OTHER

Several comments were made that do not apply to the adequacy or accuracy of the Draft EIR. These comments are reproduced here and are followed by responses.

Comment 87

"I am writing in regard to the demolition and replacement of some of the existing facilities at Laguna Honda Hospital. It is Planning Department Case No. 2000.005E. I live at the corner of Laguna Honda Blvd. and Vasquez Avenue. I am a very concerned neighbor. My concern is deep because the Planning Department and the Environmental Impacts reports have lost creditability when it comes to City owned property.

I present my case: When the new 911 Center was built at 1003 Turk St. neighbors were assured by the building permit that there would be 71 on site, employee, parking spaces. (*Fact of the matter*) **ONLY 43 ON SITE PARKING SPACES PROVIDED!** The director of the 911 Center testified to this figure before the *Transportation and land Use Committee* last year. The EIR stated that there would be a maximum of 45 employees per shift. *(Fact of the matter)* **THE DAY SHIFT HAS BETWEEN 100 AND 120 EMPLOYEES ON PREMISES!** EIR stated that there would be no significant increase in parking demand as a result of the 71 on site parking spaces. The then director of the project, Mr. Ralph Jacobsen, assured the neighbors in writing that 'There should be little, if any employee parking on the street.' *(Fact of the matter)* **THE VERY DAY THE 911 CENTER OPENED, THE LENGTH OF THREE FOOTBALL FIELDS, 875 FEET OF CURB SPACE WAS RED ZONED FOR EMPLOYEE PARKING AND TWO YEARS LATER IS STILL THERE!**

On May 15, 2000 I filed a formal complaint with the S.F Planning Department addressed to Mr. Green, rightfully claiming that the building permit at the 911 Center had been violated. Within a month I received a form letter that the Planning Department was on the case but I would have to wait my turn.

This was the last correspondence I received from them. On June 12, 2001 I wrote to Mr. Green requesting where my complaint stood after 13 months. **NO REPLY.** On October 10, 2001 I wrote Mr. Green requesting information as to where my complaint stood after 17 months. **NO REPLY.**

Hopefully you are able to see why the Planning Department and EIR's have lost creditability when it comes to City owned property. The Building Permits are not enforced. The EIR , misleads citizens. The complaint process by citizens has been stonewalled by the Director of the Planning Department himself, Mr. Green.

Perhaps you think this is an isolated case? It is not. When the San Francisco Fire Department remodeled a building at 2nd and Townsend St. for their new Headquarters, they received a legitimate parking variance. It was a historical building and they could only provide 19 of the 41 legally required on site employee parking slots. The basis for the granting of the Variance was that the Fire Department would have a 53 car parking lot located on property they owned off of Third St. A shuttle would operate between there and Headquarters thereby eliminating increased parking in the area. They did not institute the shuttle. Instead, they went to the Board of Supervisors and received 400 feet of red zone curb space around their new building.

Until my formal complaint with the Planning Department is addressed and dealt with, the EIR for Laguna Honda hospital should be considered merely fiction in relationship to the truth. The attachments should make it quite clear that what I have written is not fiction." [Note: Attachments were included with this comment letter and are not reproduced here] **James J. Corrigan**

Response 87

The public review period of the EIR process provides the public an opportunity to comment on "significant environmental issues" of the proposed project. While the frustrations aired by the commentor are appreciated, the proposed project's EIR process is not the appropriate forum in which to raise concerns regarding the credibility of the San Francisco Planning Department and environmental impact reports in general. These comments are not CEQA-related and are not pertinent to the Draft EIR or the proposed project. The proposed project has in no way played a part in the past difficulties the commentor has experienced with the San Francisco Planning Department. The commentor stated that, "...the EIR for Laguna Honda hospital should be considered merely fiction..." The Draft EIR goes to great lengths to provide an adequate assessment of the project's environmental impacts, based on known components of the project description. It is the responsibility of the San Francisco Planning Department to ensure that implementation of the project is in accordance with the project description as presented in the Draft EIR.

Comment 88

"We, the Board of Directors of this Association of homeowners, appreciate the opportunity to submit our comments to the subject report. We support the purpose, aims and basic characteristics of the project,

and are confident that its design is consistent with the highest professional standards appropriate today for such an essential municipal medical facility of civic prominence.

Appropriately shown by several maps in the report, Midtown Terrace is located east and northeast of the project site. It encompasses over eight hundred (800) detached single family homes-some thirty (30) of these properties contiguous to the eastern boundary of the project's campus.

The bulk of our comments relate to the proposed measures intended to mitigate the impacts of the adjacent neighborhoods-including ours. In reviewing, and responding to, our comments, we anticipate that you will objectively recognize their relevance to our neighborhood, and, in some cases, to that of nearby ones and/or the users of the public open space of the facility." Gilbert De La Mora, *et al.*

Response 88

The San Francisco Planning Department appreciates the time spent by the commentors reviewing the Draft EIR and preparing comments. Comments received by the Midtown Terrace Homeowners Association have been reviewed and are addressed in the appropriate areas above.

Comment 89

"To conclude, we want to reiterate that we support the project, and that the above constructive comments are submitted respectfully and in the anticipation that they will be given active consideration in the interest of mitigating the project's impact on the quality of life of all persons concerned, and of improving and preserving the characteristics of the facility and its open spaces." Gilbert De La Mora, *et al.*

Response 89

The San Francisco Planning Department appreciates the time spent by the commentors reviewing the Draft EIR and preparing comments. Comments received by the Midtown Terrace Homeowners association have been reviewed and are addressed in the appropriate areas above.

Comment 90

"We are very concerned about the process used to solicit public input on potential project impacts as part of the CEQA scoping process. St. Johns submitted comments to the planning department as part of the development of the Initial Study. These comments are documented in a letter to Ms. Gibson of the San Francisco Planning Department dated July 2, 2000. These comments were not specifically referenced in the Initial Study or in the Draft EIR. St. Johns provided additional comments to the Initial Study in April

2001. There was no public scoping meeting. There were limited public outreach (mailings) notifying residents of preparation and publication of the initial study. Please describe the reasons for not holding public scoping meetings, not including or referencing St. John's July 2000 and April 2001 comments, and why the first mailing to local residents with information regarding the CEQA process, was completion of the Draft EIR." **Eileen Finelli**

Response 90

Refer to **Response 86** regarding the relevance of the St. John's letter to the scoping process.

Comment 91

"Please make this letter a matter of record, so that my concerns are addressed by the Planning Commission. Also please respond to me in writing on these two issues. My address is at the top of this letter." **Yvonne Howard**

Response 91

The City of San Francisco Planning Department appreciates the time spent on reviewing the Draft EIR and preparing comments. Comments received by the commentor have been reviewed and are addressed in the appropriate areas above.

Comment 92

"On December 19, 2001, the Landmarks Preservation Advisory Board (Landmarks Board) held a public hearing to consider and comment on the Draft Environmental Impact Report (Draft EIR) for the Laguna Honda Hospital Replacement Project. Project sponsors and architects made an excellent and informative presentation the proposed project, and public testimony was taken. The Landmarks Board then discussed the Draft EIR in detail, and arrived at the following comments, which it hereby submits for your consideration." **Tim Kelley**

Response 92

The City of San Francisco Planning Department appreciated the comments made of the Draft EIR by the Landmarks Board. Comments received by the Landmarks Board have been reviewed and are addressed in the appropriate areas above.

Comment 93

"The distance and slope from most residents in the western side of Midtown Terrace makes a walk to the Forest Hill Muni station a difficult undertaking. From my resident approximately 20 minutes are required to walk to the station, with a much more difficult walk back uphill of 30-35 minutes.

A easier walking path providing access through the newly designed Laguna Honda Hospital from the south end of Dellbrook Avenue (around 100 Dellbrook) or from the St. John's Armenian Church would provide a public service for all the residents of the western area of Midtown Terrace. It would also serve to open up the newly designed Laguna Honda Hospital to the whole community, rather than remain a secluded city geriatric hospital. The walkway could be incorporated within a park like setting that would serve to lift the spirits of the residents of the hospital as well as the community around it. It would also serve the utilitarian need of giving easier access to Muni.

It would also serve to open up the valley that separates the hospital and the neighborhood, which at times appears to harbor camp like conditions for some less fortunate.

I am not sure if the above idea has been introduced, or it workable as I have not made a detailed study of the space. Would you be able to offer me your comments? I would like these ideas to be aired at the upcoming public hearing with an appropriate response." **Dick Lambert Jr.**

Response 93

The project sponsor is willing to work with the neighbors regarding the commentor's request for a walking path, providing access through the site . It should be noted that the analysis in the Draft EIR determined that the proposed project would not result in a significant impact related to pedestrian access and circulation. Providing access through the hospital campus is not required by CEQA and would be done by the project sponsor voluntarily (as an improvement measure).

Comment 94

"Laguna Honda has never been a good neighbor. We fully and completely support the replacement of the facility, but not in the manner they are going to do it. The EIR does not address, for example, the fact that the non-native species of eucalyptus trees that are presently there are a fire hazard. They have never cut those. In asking last night about that, the trees are such that they will fall and hit our houses. That is called an act of God and we will not get any reimbursement for that, and yet Laguna Honda does not have the money to be able to eliminate those type of things. They are a non-native species. They've been there for how long. Their leaves continue to block our downspouts. They block our rain gutters. They are acidic. They destroy our lawns. They blow on our -- the branches fall off, tear our roofs. They

damage our houses. They've been there for quite some time. They are a uniquely wonderful fire hazard, as was proven in the East Bay. Absolutely nothing has been done to mitigate that, and nothing is addressed in the EIR to address that in any way." **John Paul, Planning Commission public hearing comments, January, 10,2002.**

Response 94

The purpose of the Draft EIR is to analyze changes in existing environmental conditions and to identify potential impacts that could occur as a result of the proposed project. The eucalyptus trees are an existing condition, and while they might be considered a fire hazard and a nuisance by some, the failure of the project to address this condition is not a matter to be discussed in the Draft EIR.

Fire hazards are addressed in the project's Initial Study (**Appendix 1.0** of the Draft EIR). Fire hazards to the existing hospital residents and future hospital residents were considered as a result of the proposed project. Based on the Initial Study analyses, the existing trees (including the eucalyptus trees) are not considered a hazard to future users of the proposed project.

Certain trees, including some eucalyptus trees, would be removed as part of the proposed project. However, the main objective of the proposed project is to provide skilled nursing care in modern facilities that meet current standards. Removing non-native eucalyptus trees from the site perimeter is not part of the proposed project.

Comment 95

Homeless encampments must be kept under scrutiny on the entire land parcel. **Anne and Timothy Poirier**

Response 95

Laguna Honda hospital, under the supervision of the San Francisco Sheriffs Department, patrols the campus as part of security services. When homeless encampments are reported or observed, the Institutional Police or Sheriffs Department intervene and advise the homeless to relocate, while offering referrals to social service agencies and to homeless shelters. This method has been effective in maintaining a safe environment (while being sensitive to homeless people) and will continue as a practice at Laguna Honda hospital.

Comment 96

"I am writing to express my opposition to the proposed increase in parking spaces at Laguna Honda Hospital. I don't want my tax dollars going towards more cars, more congestion, and more pollution in my neighborhoods." **Katherine Roberts**

Response 96

The commentor's opinion is acknowledged. Please see **Response 74** for a discussion of proposed project parking.

Comment 97

"The existing parking lot is underutilized. There is a MUNI station across the street, served by numerous lines. Instead of increasing parking, you should be using public money to improve public transit to and from the hospital. This is something that will actually benefit the majority of San Franciscans, instead of adding more cars to an already car-choked city, for the benefit of a few private car-owners." **Katherine Roberts**

Response 97

Please see **Response 42** regarding transit and the use of parking on the project site, and **Responses 43** and **44** for a discussion on the TSMP. The project sponsor and architect may propose and seek approval for any design and program they would like to pursue. It is ultimately the responsibility and purview of the Planning Commission to determine if the benefits of the proposed project outweigh any potential negative effects. The Planning Commission is assisted by the Planning Department staff through their efforts to work with the project team to improve a design before it reaches the Planning Commission and, through the report, the staff prepares expressing its recommendations of the Planning Commission.

Comment 98

"We are very pleased with the proposed ingress and egress road off Woodside Avenue to be shared by the Hospital and the Youth Guidance Center. As a signalized intersection, the proposed road should reduce traffic backups on both Woodside Avenue as well as Seventh Avenue caused by the current egress of all traffic at the Hospital's main driveway." **David E. Schwartz**

Response 98

The commentor's opinion is acknowledged. Please see **Response 34** for a discussion of the proposed Woodside Avenue driveway improvements.

Comment 99

"And I would like to see the full oversight process addressed more thoroughly in terms of there's a huge project and the plan is not detailed enough to make clear where the checks are on how it's going along the way, where the oversight process happens to make sure that there aren't budget shortfalls that mean that things that are taken out that are supposed to be rebuilt don't actually get rebuilt. I assume there will be a hospital there at the end of this process, but there are very ambitious landscaping plans. I am deeply concerned that those may not be fully implemented because of the economic world that we live in. And so I'm concerned about the oversight process and the ongoing checks along the way and do not see a thorough process for that." **Deborah Wald, Planning Commission public hearing comments, January 10,2002.**

Response 99

The primary objective of the proposed project is to provide skilled nursing care and facilities that meet current standards. Another project objective is to make aesthetic improvements at the periphery of the campus boundaries. Please refer to **Response 5** for a discussion of the proposed landscaping plans. All aspects of project cost estimates are updated regularly throughout the design and construction process. Scope adjustments are made if necessary to ensure that sufficient funds are available to meet the project objectives, including those that would be implemented late in the development process. In addition, the project sponsor has confirmed that landscaping efforts are funded in the project's budget.

Comment 100

"As and adjacent residential district, the Forest Hill Association is essentially concerned with the external environmental and traffic effects of the Replacement Project, both during the prolonged anticipated demolition and construction and upon completion." **Harold A. Wright**

Response 100

Please see **Responses 37, 38, 39, 47** and **48** for a discussion on operational and construction traffic impacts associated with the proposed project.

5.0 STAFF-INITIATED CHANGES TO THE DRAFT EIR

This chapter presents staff-initiated changes to the Draft EIR. Staff-initiated changes include recent project design modifications, the addition of a new shadow section, and corrected non-substantive errors. Text added to the Draft EIR is underlined and text deleted from the Draft EIR is shown with strikethrough.

CEQA requires the recirculation of the Draft EIR after the close of the public review period, prior to certification of the Final EIR, if "significant new information" is added to the Draft EIR. The CEQA Guidelines define the term "information" to include changes in the project or environmental setting as well as additional data or other information. CEQA further states that new information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project. The CEQA Guidelines note, as an example of "significant new information," a new significant environmental impact that would result from the project or from a new mitigation measure proposed to be implemented.

New information regarding project design refinements and a shadow analysis is presented in this section. The new information clearly does not result in a significant impact and does not intensify any impacts presented in the Draft EIR. The public will be afforded the opportunity to review and comment on the new alternative as part of this document and the Planning Commission hearing on the certification of the EIR. For the reasons stated above,, the inclusion of this new information does not meet the standard of "significant new information" as defined by CEQA.

A. CHANGES TO THE PROPOSED PROJECT

Recent modifications to the proposed project have been made for technical and programmatic reasons. These changes and the reasons for them are discussed below. All changes are reflected in **Revised Figure 2.0-4, Proposed Site Plan** (presented in **Section 4.0, Comments and Responses**).

The orientation of the proposed Clarendon Hill West and East Buildings has been refined. The wings of the Clarendon Hill West and East Buildings have been shifted so that four wings, instead of two, would face south and two wings, instead of four, would face north. This revised design would allow more natural sunlight to enter the hospital rooms.

Based on recommendations from the project's soil engineer, the proposed Clarendon Hill East Building has been shifted south 20 feet on the site by developing an extended building pad from new engineered

fill. This design change would not change or alter the original grading concept as described on p. 2.0-19 of the Draft EIR.

The limits of construction have been refined. The construction limits would extend more to the east to facilitate the installation of the tree buffer along the eastern property boundary. In addition, based on updated construction details, the limits of construction on the western portion of the campus site (as shown in **Figure 2.0-4, Proposed Site** of the Draft EIR) are not correct. Therefore, the construction boundary has been extended to the west to accurately reflect the construction boundary.

The Draft EIR is hereby revised as follows to reflect the above changes:

> [p. 2.0-11, first paragraph, added after second sentence] "The proposed Clarendon Hill West and East Buildings would have eight wings total. In order to allow more natural sunlight, four wings would face south and two wings would face north. (One wing would face east and the other wing would face west.)"
>
> [p. 3.3-10, added after first paragraph] "The visual simulations were prepared based on a slightly different design than currently proposed. The slight variation in the project design includes the orientation of the proposed Clarendon Hill West and East Buildings. As currently proposed, four wings of the Clarendon Hill East and West Buildings would face south and two wings would face north. The visual simulations were based on an older version of the project design, as part of which two wings faced south and four wings faced north. The variation between the two versions of the project design is minor and would not affect the conclusions presented in this section."
>
> [p. 3.3-10, second paragraph, second sentence] "The top two stories of the proposed Clarendon Hill West Building would be visible from this viewpoint.[3]"
>
> [p. 3.3-10, fourth paragraph, fourth sentence] "Portions of the Clarendon Hill West and East Buildings would also be visible from this viewpoint.[4]"
>
> [p. 3.3-11, second paragraph, second sentence] "From this viewpoint, the majority of the proposed Link Building would be visible, as would parts of the proposed Greenhouse

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[3] This conclusion would not change with the revised orientation of the proposed Clarendon Hill East and West Buildings.

[4] Ibid.

Building and Clarendon Hill East and West Buildings.5"

[p. 6.0-8, added between sixth and seventh sentence in first paragraph] "In addition, the number of wings, and their orientation, for the proposed Clarendon Hill East Building would be different from the proposed project. Under this alternative, three wings would face north, instead of two, and two wings would face south, instead of four. One wing would face east."

[p. 6.0-8, third paragraph, second sentence] "~~Impacts in those issue aras would also be less than significant from implementation of this alternative, because the alternative would involve a similar area of disturbance and would result in a slight increase in site use by residents, employees, and visitor as compared with the proposed project.~~ The analyses provided in the Initial Study, conducted for the above-mentioned resources, pertain to the entire property. For example, the biology analysis considered the biological impacts to the entire site and not just the developed portion of the campus. In addition, implementation of this alternative would result in only a slight increase in site use by residents, employees, and visitors. For these reasons, the environmental effects associated with these resources and resulting from implementation of Alternative One would be less than significant."

[p. 6.0-13, third paragraph, added after third sentence] "The new Greenhouse and Clarendon Hill East and West Buildings would provide 1,140 new hospital beds, and would be similar in design with respect to ~~the same~~ size and building placement, as under the proposed project."

[p. 6.0-15, second full paragraph, last sentence] "~~Impacts in those issue areas would also be less than significant from implementation of this alternative, because the alternative would involve a similar area of disturbance and would result in the same increases in site use by residents, employees, and visitors.~~ The analyses provided in the Initial Study, conducted for the above-mentioned resources, pertain to the entire property. For example, the biology analysis considered the biological impacts to the entire site and not just the developed portion of the campus. In addition, implementation of this alternative would result in the same increases in site use by

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5 Ibid.

residents, employees, and visitors. For these reasons, environmental effects associated with these resources resulting from implementation of Alternative Two would be less than significant."

Appendix 2.0-1, Proposed Hospital Building Elevations is hereby revised to include building elevations that reflect the revised project design (the shift in orientation of the Clarendon Hill West and East Buildings). The revised appendix is included at the end of this chapter.

The phasing plans presented in **Appendix 2.0-2, Project Phasing Plans**, of the Draft EIR reflect the project design presented in the Draft EIR. The following revision explains how the revised project design relates to the construction phasing plans presented in the Draft EIR:

[p. *Appendix 2.0-2*, added after first sentence] "The following phasing plans reflect an earlier version of the project design for the proposed Clarendon Hill West and East Buildings. As shown in the phasing plans, four wings, instead of two, would face north, and two wings, instead of four, would face south. The variation in the project design does not have any bearing on the construction phasing presented in these plans. Thus, the construction phasing plans remain valid for the proposed project."

B. SHADOW

As discussed in the Initial Study, the San Francisco Planning Department prepared a shadow fan analysis for the proposed project, and on the basis of the shadow fan, concluded that potential impacts of the project on shadow would be less than significant. A supplemental shadow analysis was has been conducted to reflect the refined version of the project discussed in Subsection A above. A section is hereby added to the Draft EIR, **Section 3.7 Shadow**, which presents a detailed description of the shadow analysis and its results. This section is presented on the following pages. For the purposes of clarity, the section is not underlined.

3.7 SHADOW

A. SUMMARY

The Initial Study for the proposed project found impacts related to shadow to be less than significant. Some components of the project design were modified after the publication of the Draft EIR. A preliminary shadow analysis of the revised project, conducted by the San Francisco Planning Department, indicated that the proposed Clarendon Hill buildings would cast shadow on the adjacent Midtown Terrace Park during the winter months. Given that the park is a San Francisco Recreation and Park Department property, a detailed shadow analysis was conducted for the proposed project to comply with Section 295 of the Planning Code . The analysis indicated that the project would cast a shadow on the park during approximately two months of the winter, resulting in about a 0.001 percent reduction in sunlight square foot hours on the park.. The intrusion of shadow from the proposed buildings would be low compared to the available sunlight to the park, and a majority of the shadow would be cast on the tree-covered and non-public parts of the park. The San Francisco Planning Department has reviewed the detailed shadow analysis prepared for the proposed project and has determined that the shadow impacts would not be significant or adverse.

B. INTRODUCTION

Section 295 of the San Francisco Planning Code was adopted in response to Proposition K (passed in November 1984) in order to protect public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year-round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Department by any structures exceeding 40 feet unless the City Planning Commission, in consultation with the General Manager of the Recreation and Park Department, finds the impact to be insignificant.

The proposed hospital buildings would vary from five to seven stories high, with heights of up to 86.5 feet, and the new assisted living facility would be approximately four stories high, with heights of about 50 feet. Therefore, these buildings are subject to the Proposition K requirements.

C. EXISTING CONDITIONS

C1. Existing Shadow Environment

The undeveloped portions of the Laguna Honda hospital campus are in public open space uses. However, the open space area on the campus is not under the jurisdiction of the San Francisco Recreation and Park Department.

Public open spaces near the Laguna Honda hospital campus include the Midtown Terrace Park northeast of the campus on Olympia Way; the Interior Park Belt, north of the Midtown Terrace neighborhood; Mount Davidson Park, about one-half mile south of the campus; Sunset Heights Park and Hawk Hill Park, about one-half mile west of the campus; Twin Peaks Park, about one-half mile east of the campus; and a small park at the corner of Laguna Honda Boulevard and Vasquez Avenue, just south of the campus. The Interior Park Belt, Mount Davidson Park, part of Twin Peaks Park, and Midtown Terrace Park are under the jurisdiction of the Recreation and Park Department.[1]

Structures on the hospital campus mainly include the Main Hospital Building and Clarendon Hall. The Main Hospital is five stories high and the Clarendon Hall building is three stories high. All other remaining structures on the hospital campus are low in height and do not cast substantial shadow.

D. PROJECT IMPACTS

D1. Significance Criteria

As noted previously, Section 295 of the Planning Code restricts shadow upon public open spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the Planning Commission finds the impact to be insignificant. The proposed buildings would exceed a height of 40 feet and are therefore subject to Proposition K.

In addition, Section 147 of the Planning Code states that any new development in a C-3 district should be shaped, consistent with the dictates of good design and without

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1 Morlin, Mike, Assistant Superintendent of Parks, San Francisco Recreation and Park Department, personal communication, January 26, 2001.

unduly restricting the development potential of the site in question, to reduce the substantial shadow impacts on public plazas and publicly accessible spaces. Factors to be taken into account in the determination of shadow impacts include the amount of open space area shadowed, the duration of the shadow, and the importance of sunlight to the utility of the type of open space being shadowed.

The hospital campus is located within the P (Public Use) zoning district. Therefore, the proposed project would not be subject to Section 147 of the Planning Code. However, the guidelines specified under Section 147 were generally applied to determine the environmental significance of the shadow effects of the project.

D2. Impacts of the Proposed Project

Based on a preliminary shadow fan analysis conducted by the San Francisco Planning Department, the proposed Clarendon Hill East and West buildings would cast a shadow on the adjacent Midtown Terrace Park during the winter afternoons when the sun is lowest in the sky. No other shadow would be cast upon open spaces under the jurisdiction of the Recreation and Park Department within the vicinity of the hospital campus during the solar year. Currently, the existing hospital structures do not cast a shadow on the Midtown Terrace Park. Given this, a detailed shadow analysis was conducted to determine the shading impacts of the proposed project on the Midtown Terrace Park during the winter solstice (December 21) when the sun is at its greatest distance from the equator and the day is shortest.

The approximately 525,106 square-foot Midtown Terrace Park is shown in **Figure 3.7-1, Proposed Project and Midtown Terrace Park.** The southeastern portion of the park includes a community building, a sand surface play equipment area, a landscaped area with footpaths, and a grass field. The community building and play equipment area are used regularly for recreation uses and the grass area is used for picnics. These recreational uses encompass about 150,000 square feet of the park. The remaining park area includes tree-covered areas near the southern park boundary and a reservoir in the northern portion of the park. The recreational facilities provided in the park are regularly used by the public.

estimated using computer modeling to determine the pattern of shadow progression and the overall period of park shadowing on selected days.[2] The daily pattern was determined from shadows cast at one-minute intervals on December 21, the day with the most extensive shadows as the sun is at its southernmost point in the sky. Two additional days, November 26 and December 11, were selected to confirm the daily pattern. On these two days, a shadow was cast at three-minute and five-minute intervals, respectively. The study was conducted using 3D Studio Max shadow-casting software and a computer model of the hospital campus and proposed buildings. Areas of shadow were calculated using Auto CAD Release 14. The computer model was developed from aerial and ground surveys, project plans, aerial photography, Olympia Way curb elevations, and a site survey of a portion of the park in relation to curb elevations. The shadow consultant conducted an independent check of key shadows to verify the results of the computer-modeling program. Shadows were cast to determine the first and last days of the year that project shadows would reach the park and the first minute when shadows would reach the park during each day of the incursion period.

D2(b) Findings

Figure 3.7-2, Shadow Projections: December 21, 3:54 PM, shows the project-generated shadow on December 21, the day with the most extensive shadow, thus representing the "worst case." As illustrated on the figure, the shadows from the proposed structures would be cast on Olympia Way and within the southern part of Midtown Terrace Park. Approximately two-thirds of the shadow would occur in the area east of the grass field, an area that contains utility buildings and a service access road. The remaining shadow would occur on a portion of the grass area east of the community building and playground equipment. The shadow from the proposed structures would not fall on the community building, the playground equipment, or the landscaped area of the park.

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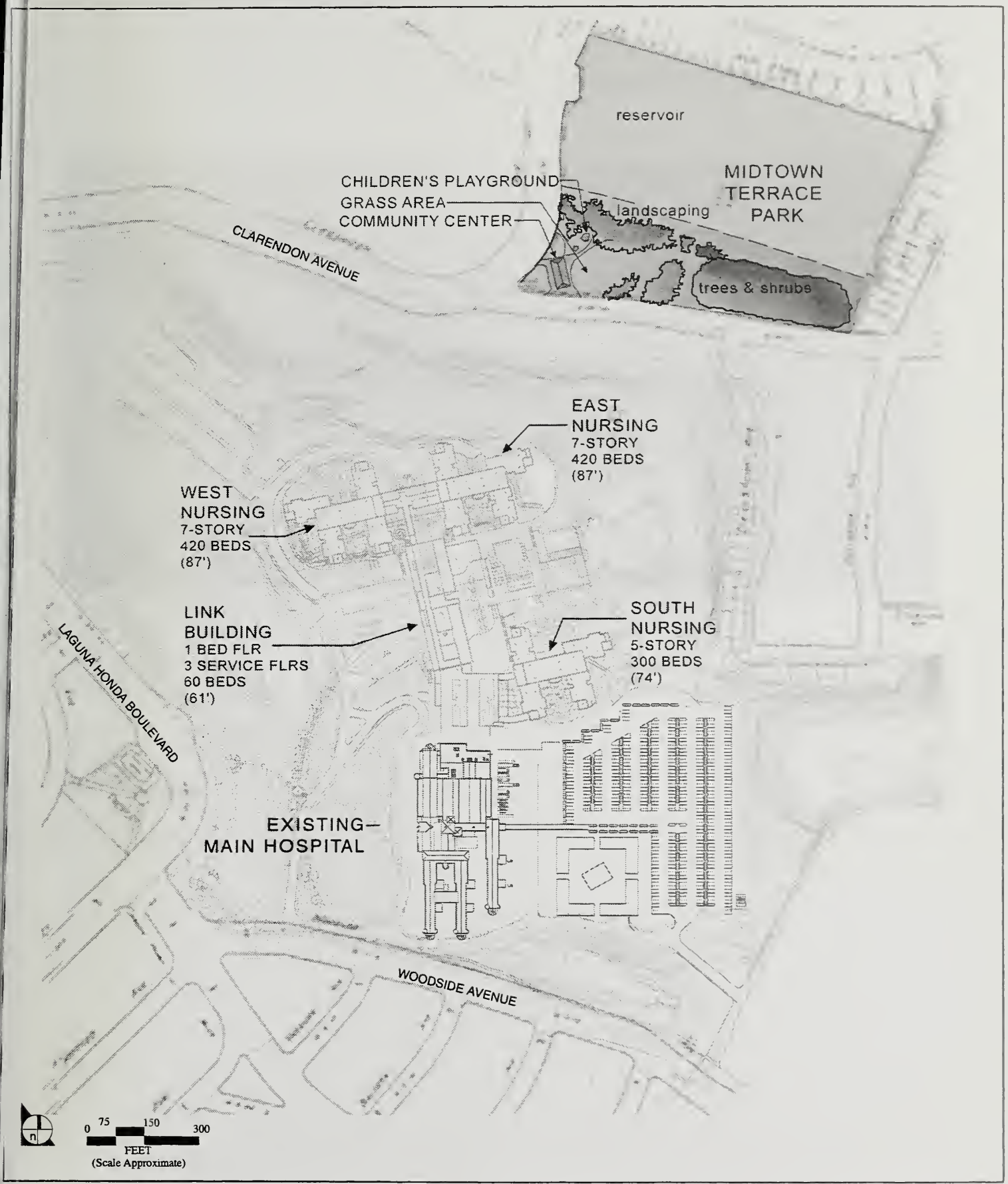
2 The modeling was conducted for the proposed Clarendon Hill West and East Buildings since these are the buildings that would result in a shadow on the adjacent Midtown Terrace Park.



SOURCE: Arnshen+ Allen Architects

FIGURE **3.7-1**

Proposed Project and Midtown Terrace Park

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0 75 150 300
FEET

SOURCE: Anshen+ Allen Architects

FIGURE **3.7-2**

Shadow Projections: December 21, 3.54 PM, PST

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The results of the study indicate that shadow from the proposed project would first occur in the park on November 17, would reach a maximum on December 21, and would not completely diminish until January 23. The proposed project would not cast a shadow on the park from January 24 through November 16. The results of the study also indicate that the duration of shadowing on November 17 and January 23 would be less than one minute. On December 21, the regulated shadow cast on the park would last for 17 minutes, from 3:37 PM until 3:54 PM, one hour before sunset.

The San Francisco Recreation and Park Commission has not established an allowable increment of new shadow for Midtown Terrace Park. Therefore, the number of shadow square-foot hours per year that the proposed buildings would generate was compared to the park's total sunlight square-foot hour availability to quantify the impacts of the proposed project.

Under Proposition K, the number of sunlight hours available during one solar year is 3,721.4 hours. Since the park has no significant pre-existing shadows from buildings, the maximum number of square foot hours of available sunlight is 3,721.4 hours times the area of the park, 525,106 square feet, for a total of about 1.95 million available sunlight square-foot hours. The percent change in sunlight square-foot hours is calculated by dividing the shadow square-foot hours resulting from the project by the park's total sunlight square foot hours. Based on the sum of maximum shadow[3] areas cast each day over the course of the year, about 138,000 shadow square foot hours, shadowing from the proposed project would result in about a 0.007 percent reduction in sunlight square foot-hours to the park.

In addition to the above results, a minute-by-minute determination was performed for the date of December 21 (the date of maximum incursion). A minute-by-minute determination provides a more accurate estimate of the total shadow square foot hours per year. The results of this analysis indicate that the actual shadow area each day would not exceed 50 percent of the maximum shadow ("last minute maximum"). Therefore, the total percentage intrusion of the shadows over the course of an entire year would be 0.5 times 0.007 percent, or about 0.0035 percent.

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3 A yearly total calculated on the basis of the maximum shadow cast each day overstates the total exposure, because the maximum area only occurs at the last minute before the end of the regulated time period each day. On each day, the shadow area grows at an increasing rate; thus the last minute is the maximum shadow for that day.

In addition, existing trees on the Laguna Honda hospital campus currently cast a shadow on the park. **Figure 3.7-3, Shadow from Existing Trees and Proposed Buildings,** shows a composite of the shadow from the existing trees and the proposed project, on December 21 at 3:54 PM. The figure indicates that the project would not cast any new shadow beyond that from the existing trees on the park. The above calculations do not take into account the shade created by the existing trees in the project vicinity.

D2(c) Conclusions

Based on a preliminary shadow fan conducted by the San Francisco Planning Department, the proposed project would add new shadow on Midtown Terrace Park northeast of the hospital campus during the winter solstice when shadow lengths are greatest. Further analysis was conducted to evaluate potential shadow impacts to the park during the winter afternoons. The analysis determined that shadow from the proposed project would reach the park on winter afternoons during times regulated by Planning Code Section 295. The analysis also determined that the duration of shadowing during each day would range from less than one minute on November 17 and January 23 to a maximum of 17 minutes on December 21. Therefore, the total time period of the shadow incursion would occur during approximately two months of the winter.

The intrusion of shadow from the proposed buildings would not exceed 0.0035 percent of the available sunlight to the park. Approximately two-thirds of the new shadow would in the area east of the grass field, an area that contains utility buildings and a service access road. Approximately one-third of the shadow impact would occur in the open grass area. Shadow from the proposed project would not be cast on the children's play area or the landscaped area. Because the shadowing would occur only at the end of the winter afternoons on a portion of the grass field, the project shadow are not likely to interfere with the public use of the open grass area. In addition, existing trees within the project site currently cast a shadow on the park, and therefore, persons using the park would not experience any new shadow from the project.

)URCE: Anshen+ Allen Architects

FIGURE **3.7-3**

Shadows from Existing Trees and Proposed Buildings

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Given the time of day, the period of the year, and the duration of the shadow, the shadow is unlikely to deter visitors from using the park. The recreational uses of the park, including the community building, the children's playground, and the area of the grass field away from the street and next to the landscaped area, would have complete access to sunlight.

In the past, new shadows have been found less than significant for environmental purposes if they fall within the cumulative limits established by the Commission resolution under Planning Code Section 195, or if they are "de minimus." Because no cumulative limit for shadow has been developed for Midtown Terrace Park, the Planning Department, for purposes of this document, relied on the guidelines established in Planning Code Section 147 to analyze shadow impacts.

Based on the detailed shadow analysis prepared for the proposed project and the guidelines set forth in Planning Code Section 147, the Planning Department finds that the shadow impacts of the proposed project are de minimus, and therefore, not significant for environmental purposes. In addition, it is anticipated that the shadow impacts on the adjacent Midtown Terrace Park from the proposed project would not be considered significant under Planning Code Section 295. This finding is subject to a final determination by the Planning Commission, acting with the advice of the Recreation and Park Commission.

The remainder of the Draft EIR is hereby revised to be consistent with the inclusion of the shadow section, as follows.

[p. 1.0-1, fourth paragraph, fourth sentence] "In the Initial Study, ~~T~~the following effects of the Laguna Honda hospital project ~~have been~~ were determined to be less than significant or to be mitigated through measures included in the project: population, air quality (air quality standards, pollutant concentrations, odors, and wind), utilities/public services, biology, geology/topography, water, energy/natural resources, hazards (emergency response plans and fire hazards), and archaeological and paleontological resources."

[p. 1.0-2, first paragraph, second sentence] "These issues are discussed in the Initial Study (see **Appendix 1.0**) and require no further environmental analysis in this EIR, with the exception of air quality (shadow effects). Based on project design modifications subsequent to the Initial Study, a shadow section is provided in this EIR."

[p. 1.0-8, added after fourth paragraph] "**B7. Shadow**

Impacts related to shadow were found to be less than significant in the Initial Study. However, due to project design changes subsequent to the Initial Study, the San Francisco Planning Department conducted a preliminary shadow analysis. Based on this analysis, it was determined that the proposed project is subject to Proposition K because the project would cast a shadow on the adjacent Midtown Terrace Park (a public use area and a park under the jurisdiction of the Recreation and Parks Department) during the winter afternoons. The proposed project would not cast shadows in other public areas surrounding the hospital campus.

Given the above, a detailed shadow analysis was conducted for the proposed project to determine shadow impacts. The analysis indicated that the percentage of incursion of shadows from the proposed project buildings would be low compared to the available sunlight to the park, and a majority of the shadow would be cast on the tree-covered and non-public parts of the Midtown Terrace Park. Lastly, the San Francisco Planning Department received the detailed shadow analysis prepared for the proposed project. Based on the analysis, the Planning Department believes that the proposed project's shadow impact on the adjacent Midtown Terrace Park would be less than significant. However, the Recreation and Park Commission must also make a determination as to

whether the shadow impact is or is not significant in accordance with Planning Code Section 295. The final determination regarding the significance of the project's shadow impact will be made by the Planning Commission, which will consider the conclusions drawn by the Planning Department and Recreation and Park Commission."

[p. 2.0-19, fifth full paragraph] "Approvals that may be required by the project sponsor include EIR certification; General Plan amendment; Zoning Map amendment; conditional use permit; shadow impact determination under Planning Code Section 295; priority policies consistency; demolition and building permits; San Francisco General Plan Consistency; and Art Commission approval.

[p.2.0-21, new subsection before **Subsection F5., Priority Policies Consistency**] "**F4. Shadow Impact Determination Under Planning Code Section 295**

Section 295 of the San Francisco Planning Code was adopted in response to Proposition K (passed in November 1984) in order to protect public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year-round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Department by any structures exceeding 40 feet unless the City Planning Commission, in consultation with the General Manager of the Recreation and Park Department, finds the impact to be insignificant.

The proposed hospital buildings would vary from five to seven stories high, with heights of up to 86.5 feet, and the new assisted living facility would be approximately four stories high, with heights of about 50 feet. Therefore, these buildings are subject to the Proposition K requirements."

[p 3.0-1, first paragraph, third sentence] "Therefore, the EIR does not discuss most of these issues. However, the Draft EIR does address shadow effects on public areas (Proposition K), because the proposed project has been refined subsequent to the completion of the Initial Study."

[p. 6.0-8, third paragraph, first sentence] "The Initial Study prepared for the proposed project determined that impacts in the following issue areas would be less than significant: population, operational noise, air quality (air quality standards, pollutant concentrations, odors, and wind), utilities/ public services, biology, geology/ topography, water, energy/ natural resources, hazards (emergency response plans and

fire hazards) and archaeological and pale ontological resources."

[p. 6.0-10, top of page, just before first full sentence] "The Initial Study for the proposed project also found that the air quality/shadow effects of the project would be less than significant. However, the Draft EIR includes an analysis of project shadow effects pursuant to Proposition K, because the proposed project has been refined subsequent to the completion of the Initial Study. Therefore, the analysis of Alternative One includes a discussion of shadow."

[p. 6.0-12, added after fifth paragraph] "*Shadow*

A qualitative analysis was conducted of the shadow impacts of Alternative One. The analysis found that the proposed Clarendon Hill East Building would cast a shadow on the adjacent Midtown Terrace Park during the same time of the year as the proposed project.

Alternative One would cast less of a shadow near the community building and more of a shadow on the eastern side of the grass area, compared to the proposed project. Similar to the proposed project however, the shadow from Alternative One would not reach the children's playground in the Park. The total shadow square foot hours under Alternative One would be about 40 percent higher than the proposed project, that results in a 010 percent reduction in sunlight square foot-hours to the Park.

Similar to the proposed project, given the time of day, the period of the year, and the duration of the shadow, the shadow is unlikely to deter visitors from using the Park. The recreational uses of the Park, including the community building, and the children's playground would have complete access to sunlight. The percent reduction in sunlight square foot hours to the Park would be slightly higher under this alternative (i.e., 0.03 percent higher). For these reasons, it appears that Alternative One would have a less than significant impact related to shadow."

[p. 6.0-13, second paragraph, add after fifth sentence] "Based on a qualitative shadow analysis conducted for Alternative One, similar to the proposed project, shadow impacts would be less than significant."

[p. 6.0-15, third paragraph, first sentence] "The Initial Study prepared for the proposed project determined that impacts in the following issue areas would be less than significant: population, operational noise, air quality (air quality standards,

pollutant concentrations, odors, and wind), utilities/public services, biology, geology/topography, water, energy/natural resources, hazards (emergency response plans and fire hazards) and archaeological and pale ontological resources."

[p. 6.0-15, sentence added to end of third paragraph] "The Initial Study for the proposed project also found that the air quality/shadow effects of the project would be less than significant. However, the Draft EIR includes an analysis of project shadow effects pursuant to Proposition K, because the proposed project has been refined subsequent to the completion of the Initial Study. Therefore, the analysis of Alternative Two includes a discussion of shadow."

[p. 6.0-17, added after fifth paragraph] "*Shadow*

A qualitative analysis was conducted of the shadow impacts of Alternative Two. The analysis found that the placement, size, and shape of the proposed Clarendon Hill West and East Buildings under this alternative would be identical to the proposed project. Subsequent to the completion of the Initial Study, a quantitative shadow analysis was prepared for the proposed project and is discussed in detail in Section 3.7, Shadow, of this Draft EIR. The findings of this shadow analysis would also apply to Alternative Two due to the identical nature of the proposed buildings (Clarendon Hill West and East and Greenhouse Building). Therefore, similar to the proposed project, Alternative Three would not cast a significant shadow on the adjacent Midtown Terrace Park and impacts to shadow are considered less than significant for this alternative."

[p. 6.0-18, second paragraph, added after seventh sentence] "Because the size, placement, and design of the proposed Clarendon Hill West and East Buildings are identical to the proposed project, shadow impacts would be similar to the proposed project, less than significant."

[p. 6.0-20, second paragraph, added after sixth sentence] "There would be no additional shadow cast on Midtown Terrace Park."

[p. 6.0-23, added row between row six and seven to **Table 6.0-4, Comparison of Impacts by Alternative**]

Shadow	No significant impacts	No significant impacts	No significant impacts	No significant impacts	Impacts of new facilities too speculative to predict

[p. 7.0-5, added new reference just before Section 6.0 Alternative reference] "**Shadow**

Morlin, Mike, Assistant Superintendent of Parks, San Francisco Recreation and Park Department, personal communication, January 26, 2001."

C. OTHER STAFF-INITIATED REVISIONS

C1. Construction Period

The Draft EIR includes an incorrect statement on p. 1.0-4 regarding the length of the construction period. In order to correct this mistake, the Draft EIR is hereby revised as follows:

[p. 1.0-4, first partial paragraph, second sentence] "~~The entire construction period is expected to take five to six years, lasting until approximately Fall 2010.~~ The entire construction period is expected to take eight years, lasting until approximately Fall 2010."

C2. General Plan Amendment

San Francisco Planning Department staff have determined that the proposed project would not require an amendment to the San Francisco *General Plan*. Originally, it was anticipated that a *General Plan* amendment may have been required to amend the boundary lines between the developed and open space areas on the campus. However, the Planning Department recently determined that the proposed project would not result in a substantial change in the open space boundary. Therefore, a *General Plan* amendment is not needed for the proposed project, and the following revisions to the Draft EIR have been made:.

[p. 1.0-4, second full paragraph, fifth sentence, first bullet] "In addition to EIR certification, the proposed project would require the following approvals:

~~• *General Plan* amendment;~~

[p. 1.0-4, second full paragraph, fourth sentence] "An adjustment to the existing boundary line would require a Zoning Map amendment pursuant to Section 302 of the Planning Code ~~and a *General Plan* amendment.~~"

[p. 2.0-19, fifth full paragraph] "Approvals that may be required by the project sponsor include EIR certification; ~~General Plan amendment; Zoning~~ Map amendment; conditional use permit; priority policies consistency; demolition and building permits; San Francisco General Plan Consistency; and Art Commission approval. A discussion of each of these requirements is provided below. Initially it was anticipated that a General Plan amendment would also be required to amend the boundary lines between the developed and open space areas on the campus. However, after reviewing project plans, the Planning Department determined that the proposed project would not result in a substantial change in the open space boundary. As a result, a General Plan amendment would not be necessary for approval of the project."

[p. 2.0-20, second full paragraph] "~~**F2. General Plan Amendment**~~

~~Due to the proposed siting of the new/replacement buildings, the project may result in a change to the boundary between the developed and open space areas on the site, as shown in the San Francisco *General Plan*. Such an adjustment would require amending the boundary lines within the project site on the following maps of the *General Plan*: Map 1 (Public Ownership of Existing Open Space) and Map 4 (Citywide Recreation & Open Space) in the Recreation and Open Space Element; and Map 4 (Urban Design Guidelines for Heights of Buildings) in the Urban Design Element.~~

~~The amendment would require a hearing by the Planning Commission. If the Commission finds "from the facts presented that the public necessity, convenience and general welfare require the proposed amendment or any part thereof," the Commission shall approve the amendment and present it to the Board of Supervisors for approval. The Board may adopt the amendment by a majority vote.~~"

[p. 2.0-20, fourth full paragraph, fourth sentence] "~~Similar to the procedures for an~~

~~amendment to the *San Francisco General Plan,* a~~An amendment to the Zoning Map would require a hearing by the Planning Commission."

[p. 3.1-1, first paragraph, fourth sentence] "*An adjustment to the existing boundary line would require a Zoning Map amendment pursuant to Section 302 of the Planning Code ~~and a General Plan amendment~~.*"

[p. 3.1-10, subsection F1(a), third and fourth sentences] "This rezoning would require ~~both~~ a modification to the Zoning Map (Sheet 6-H) ~~and a *General Plan* amendment,~~ as discussed below. Pursuant to Section 302 of the Code, the Zoning Map ~~and *General Plan* amendments~~ would require a public hearing by the Planning Commission."

[p. 3.1-12, subsection F2] "~~**F2. General Plan Amendments**~~

~~Due to the proposed siting of the new/replacement buildings, the project may result in a change to the boundary between the developed and open space areas on the site, as shown in the *San Francisco General Plan*. This adjustment would involve amending the boundary lines within the project site on the following maps: Map 1 (Public Ownership of Existing Open Space) and Map 4 (Citywide Recreation & Open Space) in the Recreation and Open Space Element; and, Map 4 (Urban Design Guidelines for Heights of Buildings) in the Urban Design Element.~~"

[p. 6.0-10, third full paragraph] "~~The proposed location of the replacement buildings could require modification of the boundary between the 80-D and OS height and bulk districts. The extent of the potential boundary modification between the 80-D and OS districts on the site is not known at this time, because the current boundary is approximate and its precise location on the site is not known. That adjustment would be considered a Planning Code Amendment pursuant to Section 302 of the Code. Modification of the bulk district boundary may result in a decrease in the amount of land designated as open space on the project site; however, the majority of the undeveloped land on the project site would remain. There would be somewhat less open space in the east central part of the site under this alternative compared to the proposed project because of the increased size of the Greenhouse and Clarendon East buildings.~~ The existing open space boundary has not been clearly defined by the Planning Department and is presented as an approximation on **Figure 2.0-2, Existing Site Plan**. However, the Planning Department determined that the proposed project would not result in a substantial change in the open space boundary and thus a *General*

Plan amendment would not be needed to implement the proposed project."

[p. 6.0-15, fifth paragraph] "~~The proposed location of the replacement buildings could require modification of the boundary between the 80-D and OS height and bulk districts. The extent of the potential boundary modification between the 80-D and OS districts on the site is not known at this time, because the current boundary is approximate and its precise location on the site is not known. That adjustment would be considered a Planning Code Amendment pursuant to Section 302 of the Code. Modification of the bulk district boundary may result in a decrease in the amount of land designated as open space on the project site; however, the majority of the undeveloped land on the project site would remain. The land area used for development would be similar to that used under the proposed project.~~ The existing open space boundary has not been clearly defined by the Planning Department and is presented as an approximation on **Figure 2.0-2, Existing Site Plan.** However, the Planning Department determined that the proposed project would not result in a substantial change in the open space boundary and thus a *General Plan* amendment would not be required for the proposed project."

C3. Alternative Three Summary

As described earlier in this document, the project sponsor has developed a preferred alternative, Alternative Three (please refer to **Section 2.0** of this document). The following summary will be added to the Draft EIR.

[p. 1.0-19, add after first paragraph] "**Partial Preservation Alternative Three**

Alternative Three would retain and rehabilitate portions of the Main Hospital Building including Wings A, B, C, and H for administrative use and Winds K and M and portions of Wings L and O as an assisted living facility. This alternative would reduce levels of impacts to historic architectural resources by retaining Wings K and M and portions of L and O of the Main Hospital Building. Although other wings would be demolished under this alternative, the retention of the additional wings would leave more of the building intact. However, impacts to historic architectural resources would still be significant. Construction noise levels during Phase Three-B would be lower than under the proposed project, but would still be significant. Impacts to transportation, circulation, and parking would be less than significant, similar to the proposed project. Impacts regarding land use and planning and would be similar to those of the proposed

project; i.e., less than significant. This alternative would have the same significant impact to view from Twin Peaks as under the proposed project. Impacts to shadow on Midtown Terrace Park would be less than significant, the same as the proposed project. Alternative Three would meet all 20 objectives."

C4. Elevation of the Existing Hospital Buildings

The height of Wing K in the existing Main Hospital Building extends to an elevation of 649 feet msl, which is above the maximum tower height reported in **Chapter 2.0, Project Description,** of the Draft EIR. The Draft EIR is hereby revised to correct this inaccuracy as follows:

[p. 2.0-11, first full paragraph, sixth sentence] "(By comparison, the grade level of the front of the existing Main Hospital Building is at an elevation of 516 feet msl, and the building height extends to 579 feet msl at roof level and ~~619~~ 649 feet msl at the tower [which is at the front and center of the existing Main Hospital Building]."

[p. 3.3-11, third full paragraph, second sentence] "The roof levels of the proposed buildings would range in elevation from about 560 feet to about 605 feet above msl, while the roof levels of the existing hospital buildings range in elevation from 579 feet to 619 649 feet above msl."

C5. Changes to Table 6.02, Comparison of Impacts by Alternative

Table 6.0-2, Comparison of Impacts by Alternative, (renumbered as **Table 6.0-4**) is hereby revised to include a comparison of Alternative Three to the proposed project and the other two alternatives presented in the Draft EIR. The revised table is presented at the end of this chapter.

C6. Changes to Draft EIR Graphics

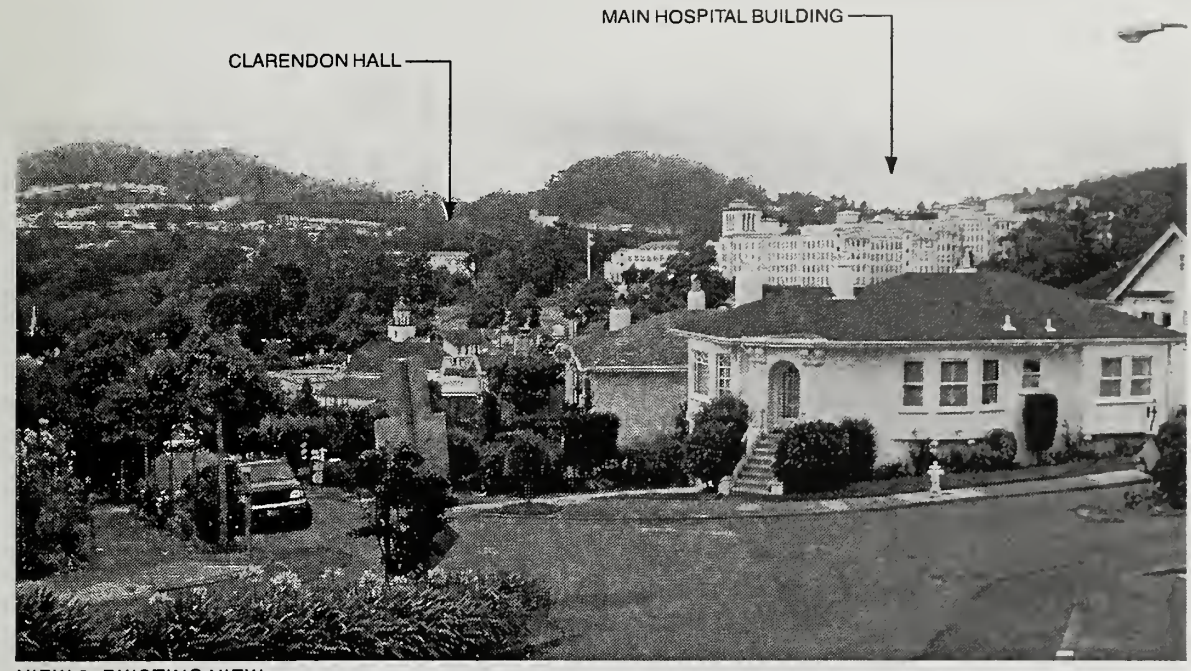
Figure 3.3-3, View 2: Looking Northeast from Edgehill Way, incorrectly labels the proposed Clarendon Hill East Building as the proposed Greenhouse Building, and does accurately identify the proposed Greenhouse Building. This figure is hereby revised to correctly label the proposed Clarendon Hill East and Greenhouse buildings. In addition, the **Project Phasing Plans** in **Appendix 2.0-2** of the Draft EIR have been revised to reconcile minor inconsistencies. These revised figures are included in this chapter.

Table 6.0-~~2~~4
Comparison of Impacts by Alternative

Impact Category	Proposed Project	Alternative One	Alternative Two	Alternative Three	No Project Alternative
Land Use	No significant impacts	No significant impacts	No significant impacts	No significant impacts	Impacts too speculative to predict
Transportation, Circulation, and Parking	No significant impacts	No significant impacts	No significant impacts	No significant impacts	Impacts too speculative to predict
Visual Quality	Significant impact to view from Twin Peaks Park	Significant impact to view from Twin Peaks Park	Significant impact to view from Twin Peaks Park	Significant impact to view from Twin Peaks Park	Impacts too speculative to predict
Construction Noise	Significant impacts to hospital residents during all phases; significant impacts to senior housing residents during Phase Three-B; significant exceedance of City Noise Ordinance at times during construction	Significant impacts to hospital residents during all phases except Phase Three-A; significant impacts to senior housing residents during portions of Phase Three-B; potential significant impact to Dellbrook residents during Phase Two; significant exceedance of City Noise Ordinance at times during construction	Reduced noise impacts to hospital residents during Phase Three-B, but still significant; significant exceedance of City Noise Ordinance at times during construction	Reduced noise impacts to hospital residents during Phase Three-B, but still significant; significant exceedance of City Noise Ordinance at times during construction	Impacts too speculative to predict

Table 6.0-4 (continued)
Comparison of Impacts by Alternative

Impact Category	Proposed Project	Alternative One	Alternative Two	Alternative Three	No Project Alternative
Historic Architectural Resources	Significant impacts due to demolition of Clarendon Hall, most of Main Hospital, and support structures	Significant impacts due to demolition of Clarendon Hall, most of Main Hospital, and support structures; reduced impact due to preservation of Clarendon Hall	Significant impact due to demolition of Clarendon Hall and support structures; reduced impact due to more of Main Hospital preserved	Significant impact due to demolition of Clarendon Hall and support structures; reduced impact due to more of Main Hospital preserved	Impacts too speculative to predict
Hazards	Potentially significant impacts associated with hazardous building materials and soil and groundwater contamination	Potentially significant impacts associated with hazardous building materials and soil and groundwater contamination	Potentially significant impacts associated with hazardous building materials and soil and groundwater contamination	Potentially significant impacts associated with hazardous building materials and soil and groundwater contamination	Impacts too speculative to predict
Project Objectives	Meets project objectives	Meets 12 of 20 project objectives; would not meet Objectives3, 9, 10, 11, 13, 16, 19, and 20	Meets 16 of 20 project objectives; would not meet Objectives 15 and 18; may not meet 19 and 20	Meets all project objectives	Does not meet most or all project objectives



VIEW 2: EXISTING VIEW

VIEW 2: VIEW WITH PROJECT

OURCE: Merrill + Befu Associates

FIGURE **3.3-3**

View 2: Looking Northeast from Edgehill Way(Revised)

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3A EXISTING LAUNDRY

4A EXISTING BOILER ROOM

5A EXISTING PROPANE TANKS

6A EXISTING VEHICLE FUELING STATION

7A EXISTING HAZ. MAT. SHED

8A EXISTING ZOO BUILDING

9A EXISTING GREENHOUSE

10A EXISTING SHOPS

11A EXISTING GARAGE

12A EXISTING BRIDGE BUILDING

13A EXISTING MUNI SUBSTATION

N

• – 603 EXISTING PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

PHASE A

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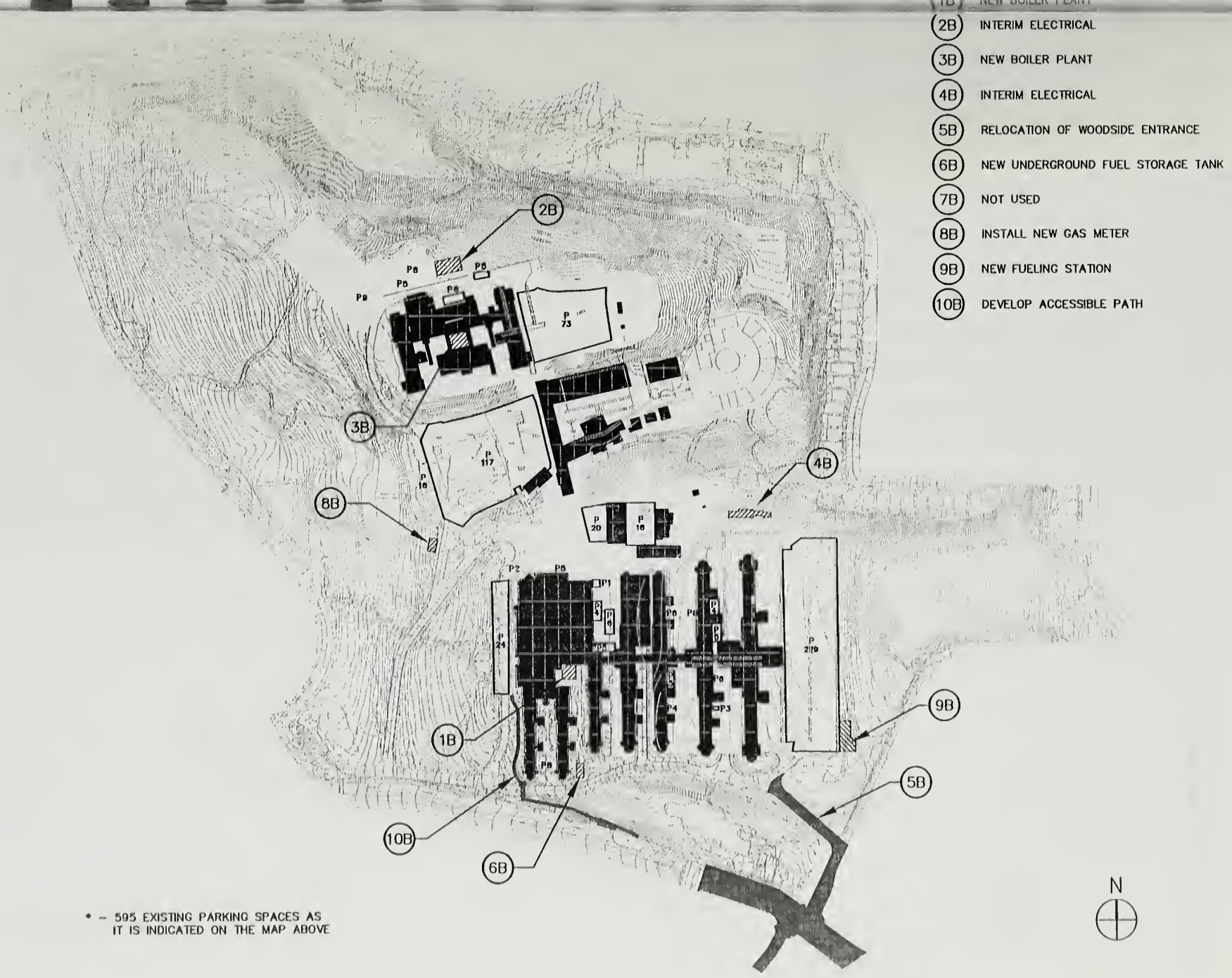

(1B) NEW BOILER PLANT

(2B) INTERIM ELECTRICAL

(3B) NEW BOILER PLANT

(4B) INTERIM ELECTRICAL

(5B) RELOCATION OF WOODSIDE ENTRANCE

(6B) NEW UNDERGROUND FUEL STORAGE TANK

(7B) NOT USED

(8B) INSTALL NEW GAS METER

(9B) NEW FUELING STATION

(10B) DEVELOP ACCESSIBLE PATH

* – 595 EXISTING PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

PHASE B

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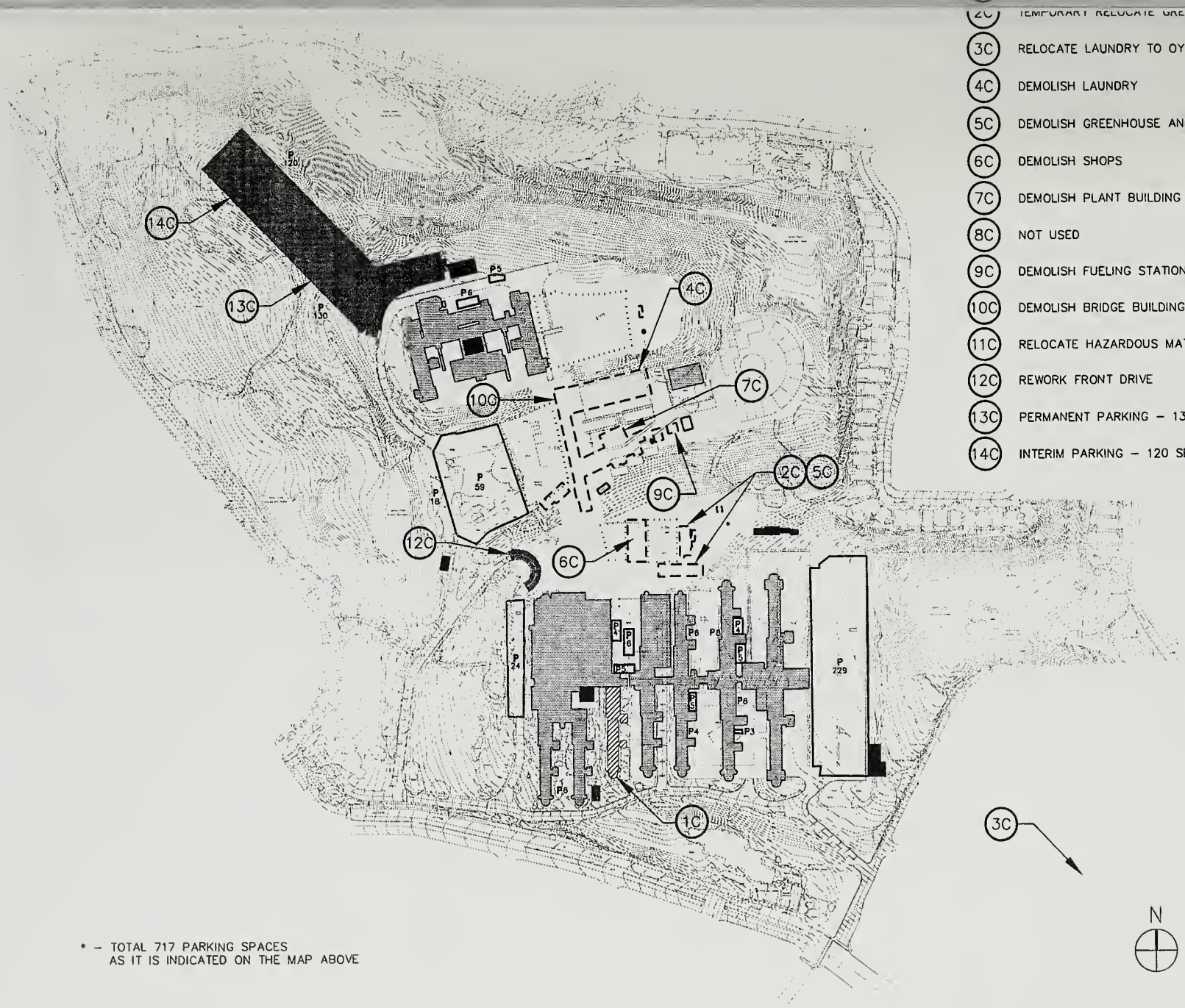

2C TEMPORARY RELOCATE GREENHOUSE & FARM

3C RELOCATE LAUNDRY TO OYSTER POINT BLVD.

4C DEMOLISH LAUNDRY

5C DEMOLISH GREENHOUSE AND FARM

6C DEMOLISH SHOPS

7C DEMOLISH PLANT BUILDING

8C NOT USED

9C DEMOLISH FUELING STATION

10C DEMOLISH BRIDGE BUILDING

11C RELOCATE HAZARDOUS MATERIALS SHED

12C REWORK FRONT DRIVE

13C PERMANENT PARKING – 130 SPACES

14C INTERIM PARKING – 120 SPACES

* – TOTAL 717 PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

PHASE C

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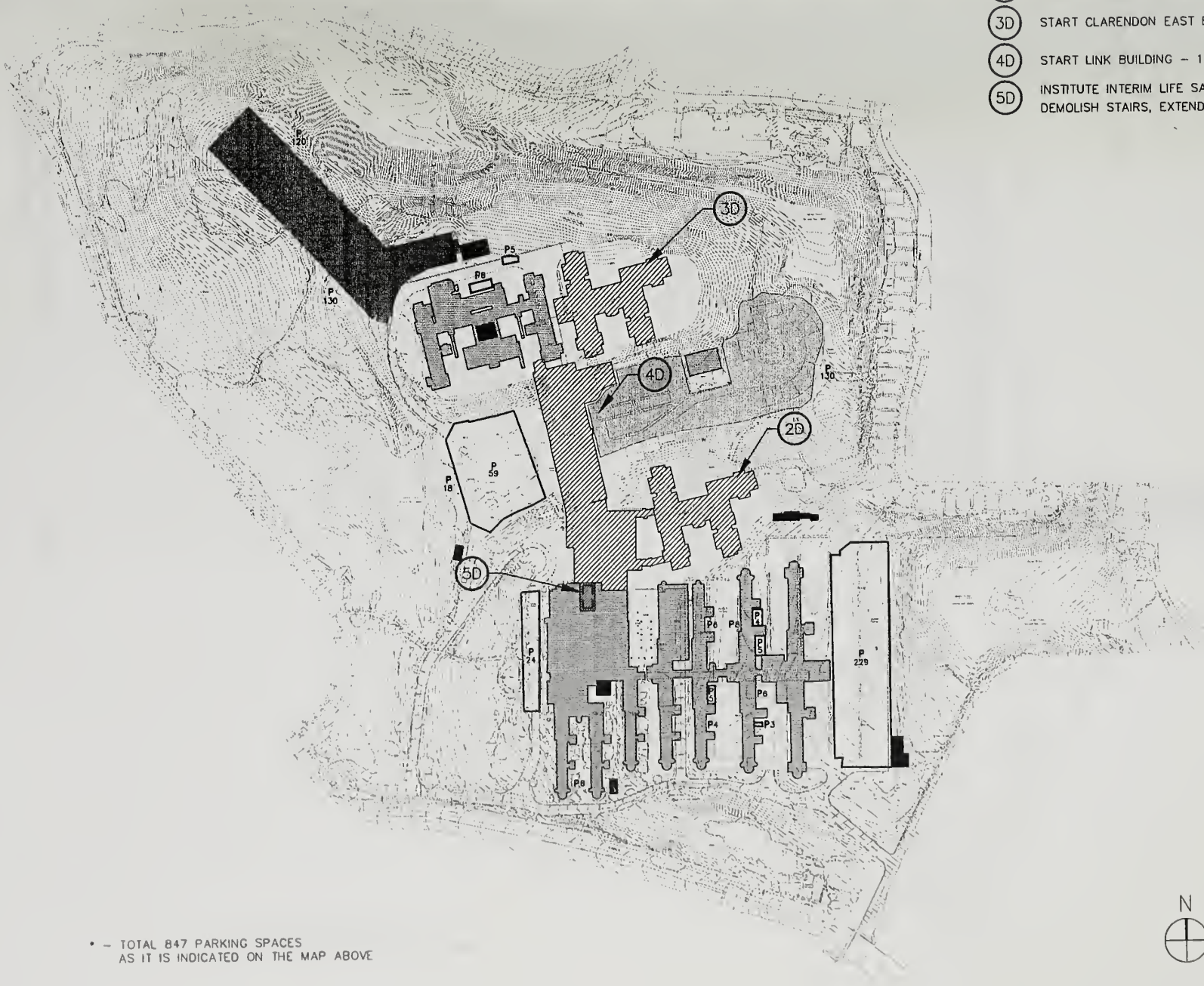
(2D) START GREENHOUSE BUILDING – 360 BEDS

(3D) START CLARENDON EAST BUILDING – 360 BEDS

(4D) START LINK BUILDING – 120 BEDS

(5D) INSTITUTE INTERIM LIFE SAFETY MEASURES
DEMOLISH STAIRS, EXTEND CORRIDORS



N

• – TOTAL 847 PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

PHASE D

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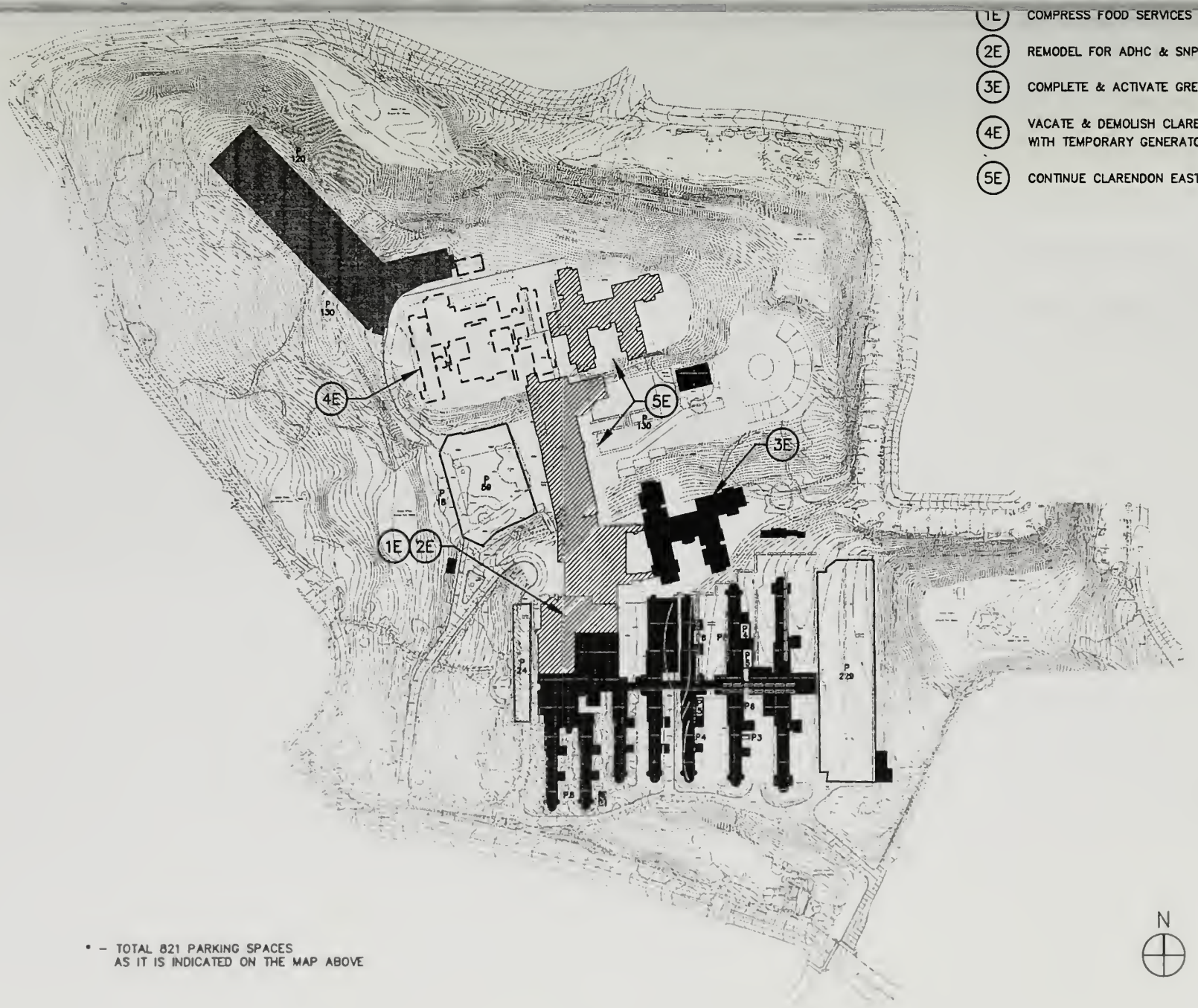

1E COMPRESS FOOD SERVICES AT LEVEL 3

2E REMODEL FOR ADHC & SNP

3E COMPLETE & ACTIVATE GREENHOUSE BUILDING

4E VACATE & DEMOLISH CLARENDON HALL ALONG WITH TEMPORARY GENERATOR & FUEL TANK

5E CONTINUE CLARENDON EAST & LINK BUILDINGS

* – TOTAL 821 PARKING SPACES
AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE E

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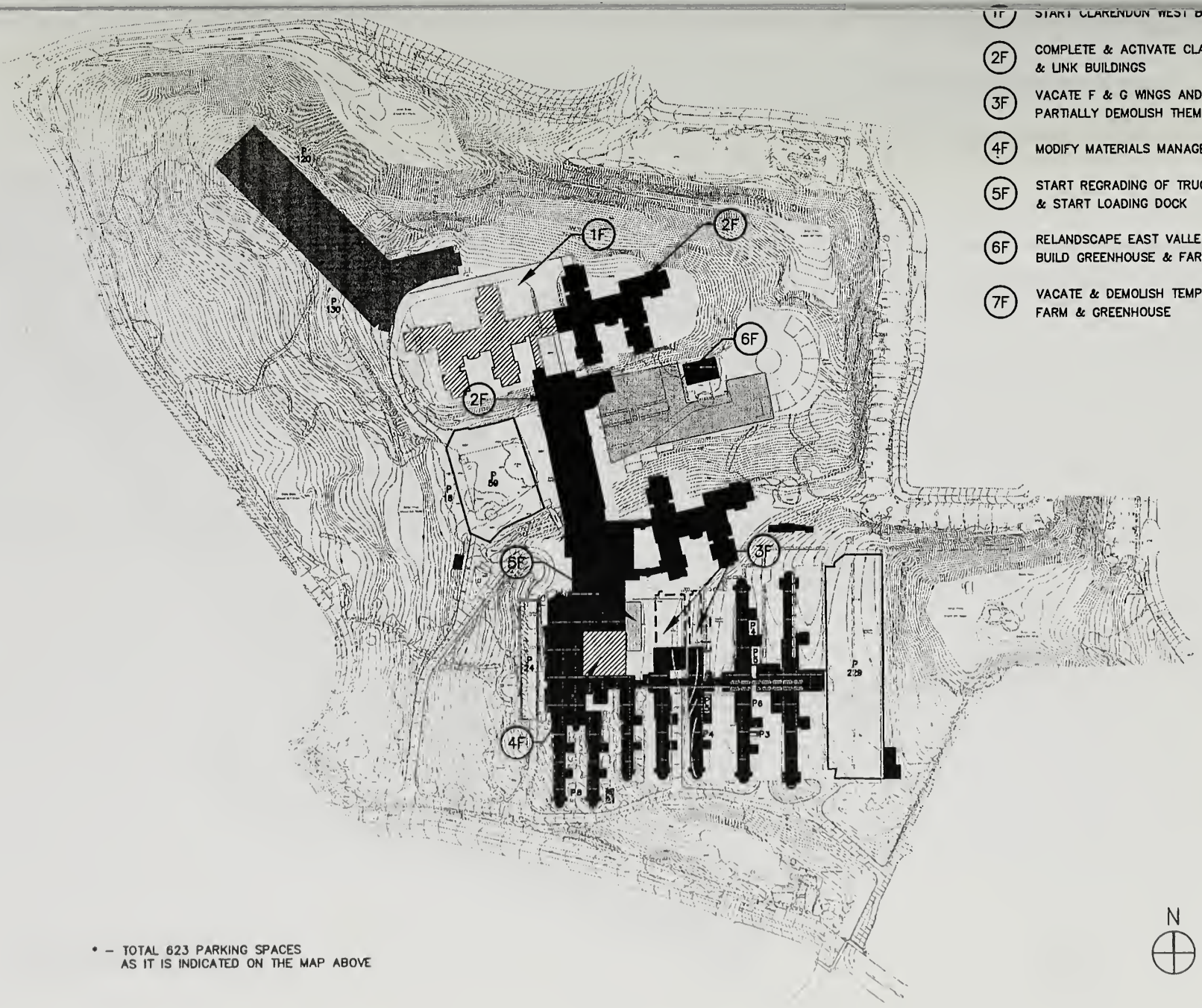

1F START CLARENDON WEST BUILDING – 360 BEDS

2F COMPLETE & ACTIVATE CLARENDON EAST & LINK BUILDINGS

3F VACATE F & G WINGS AND PARTIALLY DEMOLISH THEM

4F MODIFY MATERIALS MANAGEMENT

5F START REGRADING OF TRUCK COURT & START LOADING DOCK

6F RELANDSCAPE EAST VALLEY, BUILD GREENHOUSE & FARM

7F VACATE & DEMOLISH TEMPORARY FARM & GREENHOUSE

* – TOTAL 623 PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE F

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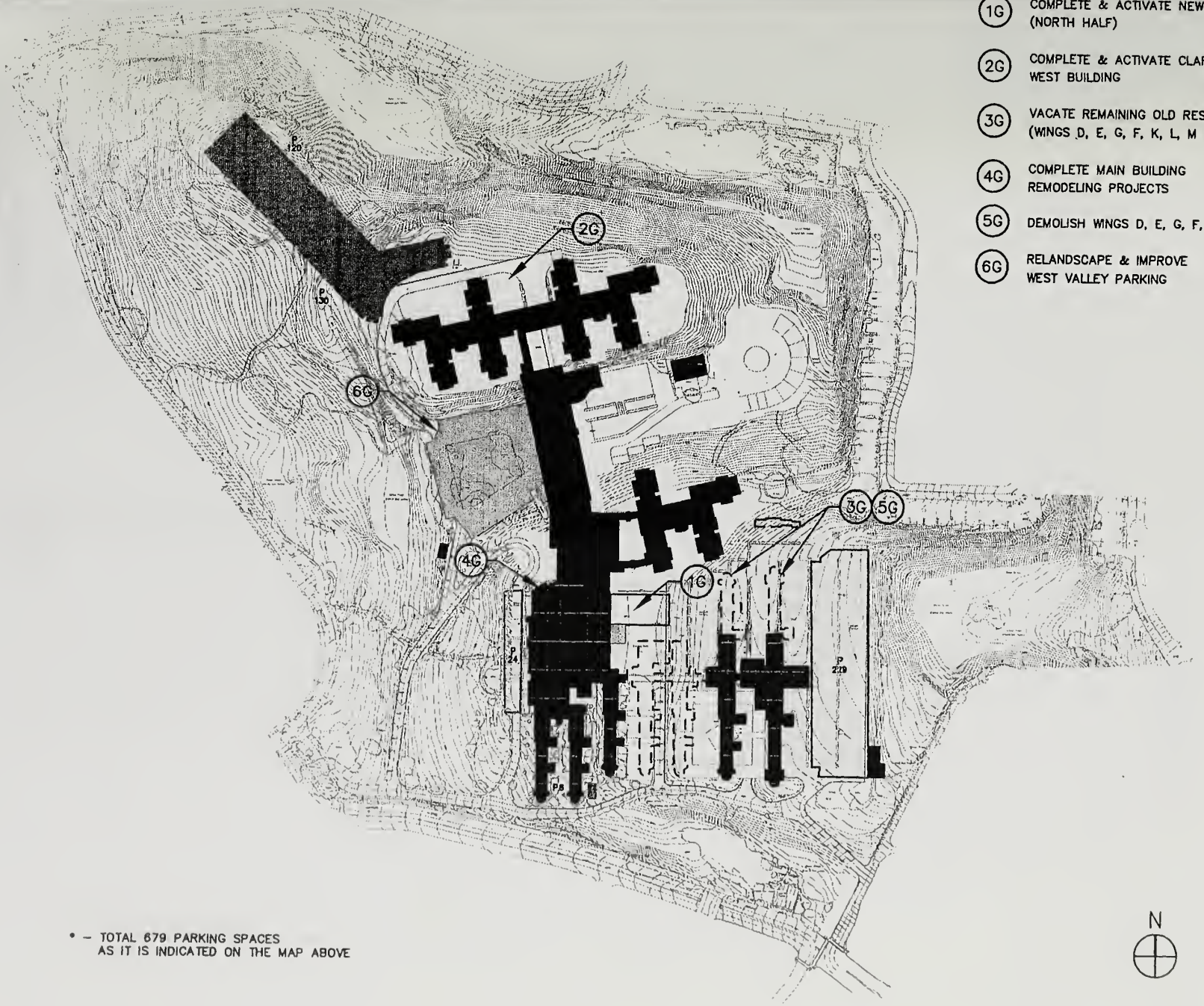

1G COMPLETE & ACTIVATE NEW LOADING DOCK (NORTH HALF)

2G COMPLETE & ACTIVATE CLARENDON WEST BUILDING

3G VACATE REMAINING OLD RESIDENTIAL UNITS (WINGS D, E, G, F, K, L, M & O)

4G COMPLETE MAIN BUILDING REMODELING PROJECTS

5G DEMOLISH WINGS D, E, G, F, K, L, M & O

6G RELANDSCAPE & IMPROVE WEST VALLEY PARKING

* – TOTAL 679 PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE G

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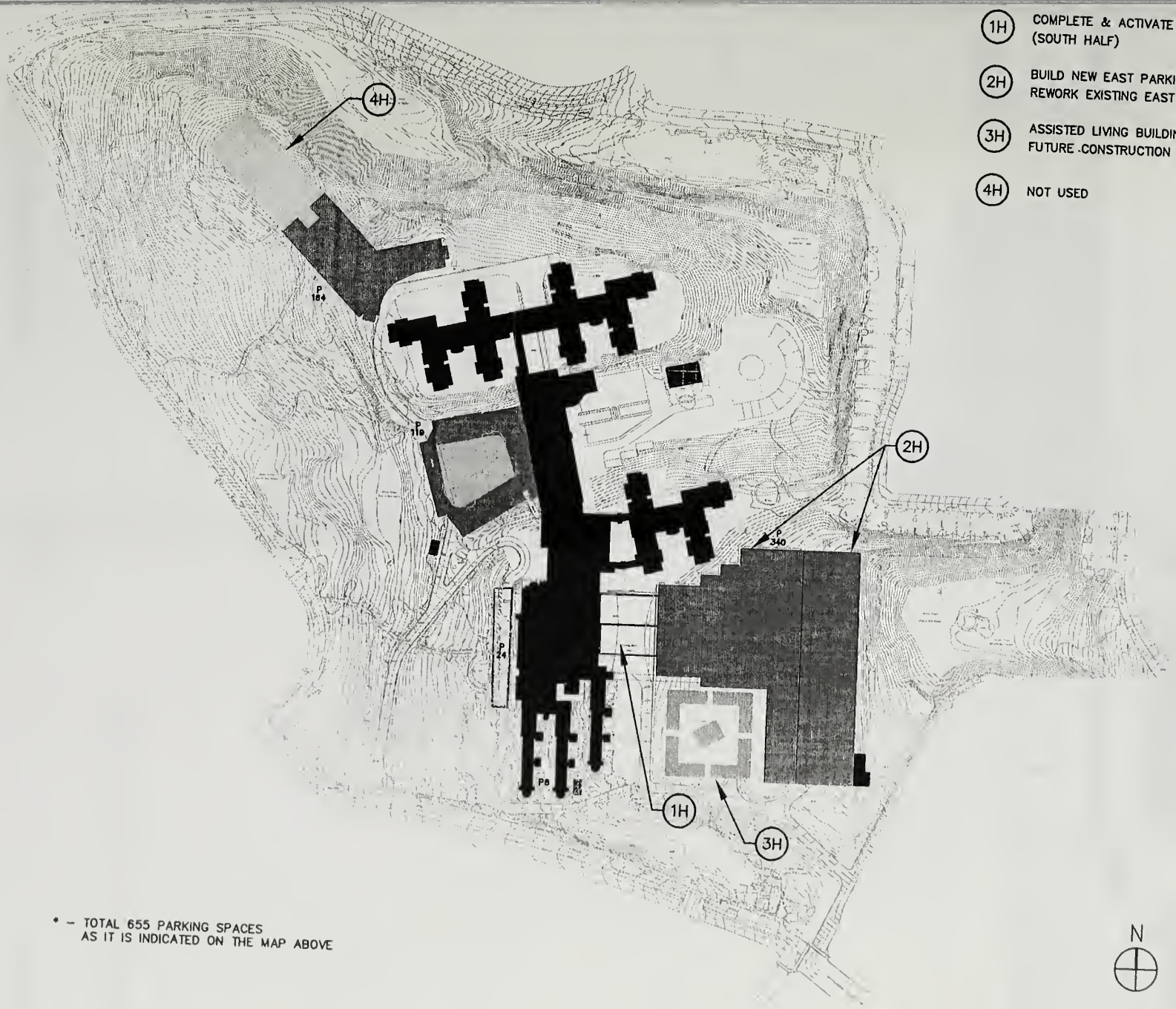

1H COMPLETE & ACTIVATE NEW LOADING DOCK (SOUTH HALF)

2H BUILD NEW EAST PARKING, REWORK EXISTING EAST PARKING

3H ASSISTED LIVING BUILDING – FUTURE CONSTRUCTION

4H NOT USED

* – TOTAL 655 PARKING SPACES AS IT IS INDICATED ON THE MAP ABOVE

N

PHASE H

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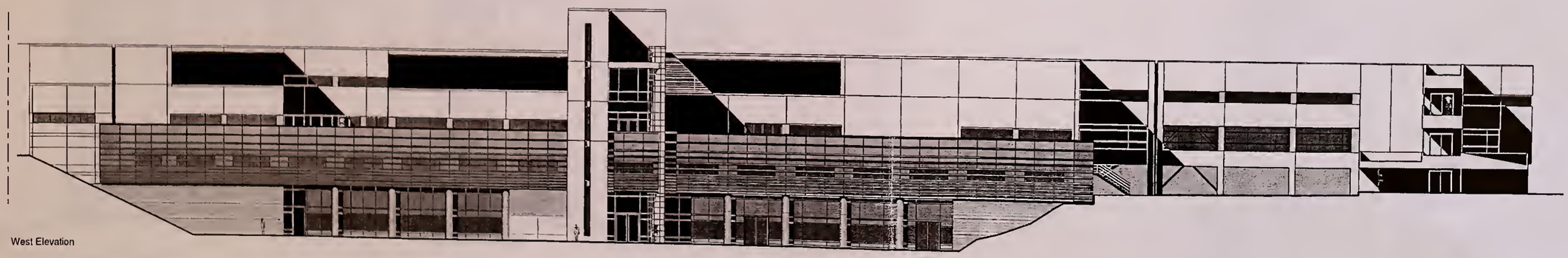
East Elevation

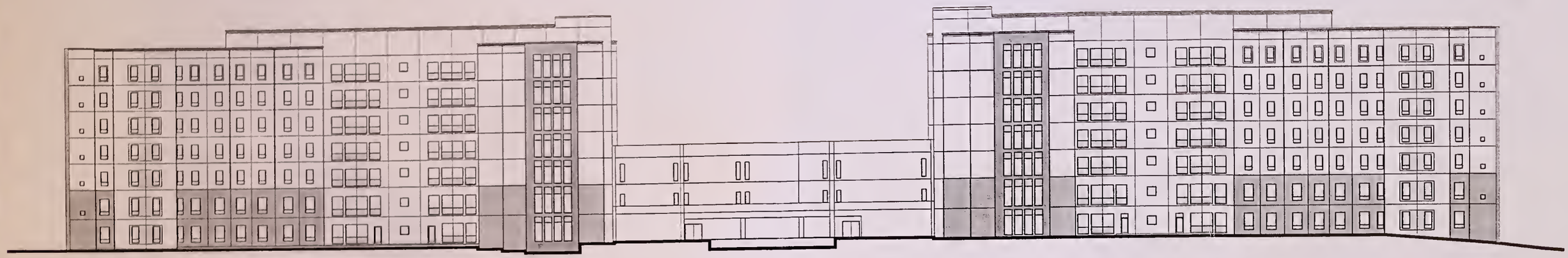


West Elevation

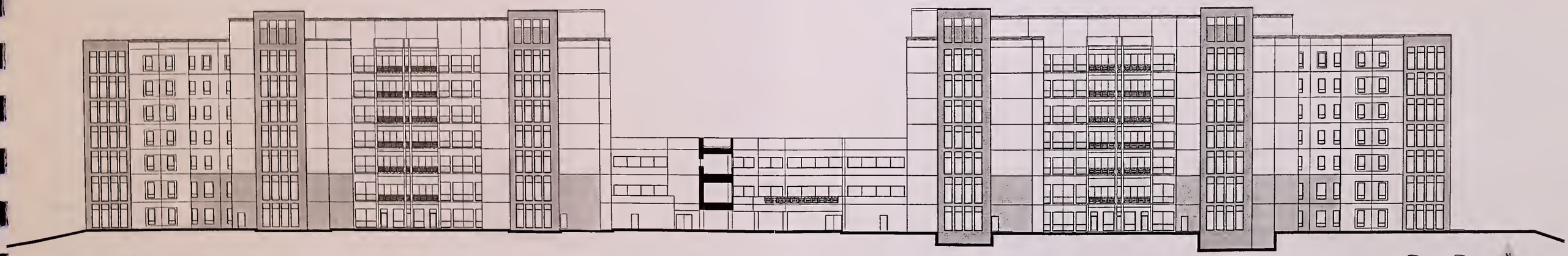
LINK BUILDING ELEVATIONS

Laguna Honda Hospital Replacement Program
San Francisco, California

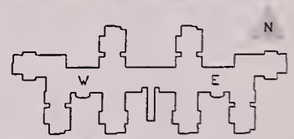
ANSHEN + ALLEN Architects
GORDON H CHONG & Partners
May 31, 2002

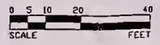


North Elevation



South Elevation





EAST AND WEST CLARENDON ELEVATIONS

Laguna Honda Hospital Replacement Program

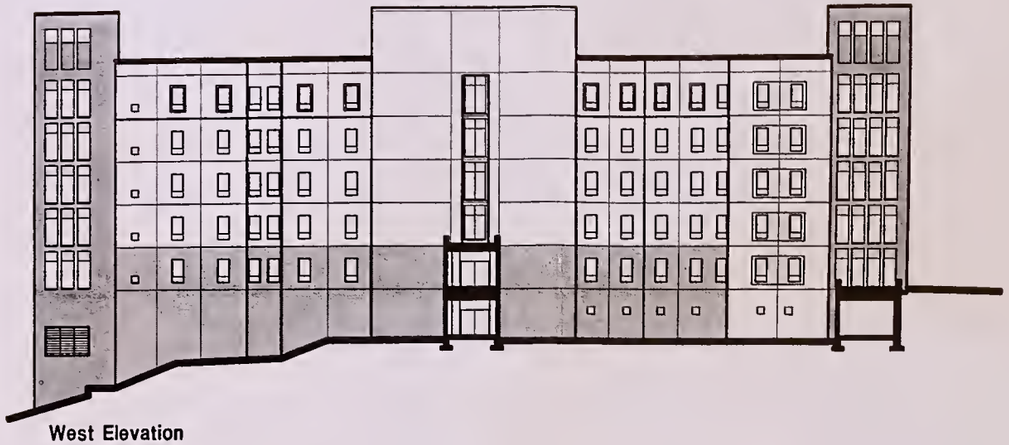
San Francisco, California

ANSHEN + ALLEN Architects

GORDON H CHONG & Partners

May 31, 2002

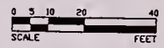
South Elevation



West Elevation

North Elevation

East Elevation



GREENHOUSE ELEVATIONS

Laguna Honda Hospital Replacement Program

San Francisco, California

ANSHEN + ALLEN Architects

GORDON H CHONG & Partners

May 31, 2002

APPENDIX 1.0

Comment Letters

Planning Commission Public Hearing Transcript

66 Vasquez Ave.
San Francisco, CA. 94127
January 14, 2002

S.F. Planning Commission
Attn: Environmental Review Officer
1660 Mission St. Suite 500
San Francisco, CA. 94103

Dear Mr. Paul Maltzer:
I am writing in regard to the demolition and replacement of some of the existing facilities at Laguna Honda Hospital. It is Planning Department Case No. 2000.005E.
I live at the corner of Laguna Honda Blvd. and Vasquez Ave. I am a very concerned neighbor.
My concern is deep because the Planning Department and the Environmental Impact reports have lost credibility when it comes to City owned property.
I present my case:
When the new 911 Center was built at 1003 Turk St. neighbors were assured by the building permit that there would be 71 on site, employee, parking spaces. *(Fact of the matter)* **ONLY 43 ON SITE PARKING SPACES PROVIDED!** The Director of the 911 Center testified to this figure before the *Transportation and land Use Committee* last year.
The EIR stated that there would be a maximum of 45 employees per shift. *(Fact of the matter)* **THE DAY SHIFT HAS BETWEEN 100 AND 120 EMPLOYEES ON PREMISES!**

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EIR stated that there would be no significant increase in parking demand as a result of the 71 on site parking spaces. The then director of the project, Mr. Ralph Jacobsen, assured the neighbors in writing "There should be little, if any, employee parking on the street." *(Fact of the matter)* **THE VERY DAY THE 911 CENTER OPENED, THE LENGTH OF THREE FOOTBALL FIELDS, 875 FEET OF CURB SPACE WAS RED ZONED FOR EMPLOYEE PARKING AND TWO YEARS LATER IS STILL THERE!**

On May 15, 2000 I filed a formal complaint with the S.F. Planning Department addressed to Mr. Green, rightfully claiming that the building permit at the 911 Center had been violated. Within a month I received a form letter that the Planning Department was on the case but I would have to wait my turn. This was the last correspondence I received from them
On June 12, 2001 I wrote to Mr. Green requesting where my complaint stood after 13 months. **NO REPLY.**
On October 10, 2001 I wrote Mr. Green requesting information as to where my complaint stood after 17 months. **NO REPLY**
Hopefully you are able to see why the Planning Department and EIR's have lost credibility when it comes to City owned property. The Building Permits are not enforced. The EIR misleads citizens. The complaint process by citizens has been stonewalled by the Director of the Planning Department himself, Mr. Green.

Perhaps you think this is an isolated case? It is not.
When the San Francisco Fire Department remodeled a building at 2nd and Townsend St. for their new Headquarters, they received a legitimate parking variance. It was a historical building and they could only provide 19 of the 41 legally required on site employee parking spots. The basis for the granting of the Variance was that the Fire Department would have a 53 car parking lot located on property they owned off of Third St. A shuttle would operate between there and Headquarters thereby eliminating increased parking in the area. They did not institute the shuttle. Instead, they went to the Board of Supervisors and received 400 feet of red zoned curb space around their new building.

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Until my formal complaint with the Planning Department is addressed and dealt with, the EIR for Laguna Honda hospital should be considered merely fiction in relationship to the truth.
The attachments should make it quite clear that what I have written is not fiction.

Sincerely yours,

James J. Corrigan

66 Vasquez Ave.
San Francisco, CA. 94127
May 15, 2000

S.F. Planning Department
1660 Mission St.
San Francisco, CA. 94103

Dear Mr. Green:
This is a formal complaint against the City of San Francisco for non-compliance with the terms of the Building Permit issued for the construction of the new 911 Center at Turk and Laguna Sts.
One of the violations is non-compliance with the number of off-street parking spaces. The 911 Center was to provide 71 parking spaces per the Permit. They have supplied only 60% of that figure.
Neighborhood parking has now been severely impacted because 870 feet of curb space on Turk St. has been red zoned, set aside for permit parking.
On December 7, 1999 I filed a formal complaint with you regarding a similar violation at the new Fire Department Headquarters at 698 2nd St. Despite it being May of 2000, your Department has not communicated any progress to my complaint.
I include the attached letter to the Board of Supervisors. It designates, among others, the Planning Commission's manipulation of neighborhood groups and their impotence in enforcing violations of the Planning Code.
Thank you for your time and consideration to this issue.

Sincerely yours,

James J. Corrigan

cc: Mr. Bressanutti
Mayor Brown
Transportation and Land Use Committee

66 Vasquez Ave.
San Francisco, CA. 94127
June 12, 2001

S.F. Planning Department
1660 Mission St.
San Francisco, CA. 94103

Dear Mr. Green:
On May 15, 2000 I wrote to you with a formal complaint of non-compliance with the Building Permit obtained by the new 911 Center at Turk & Laguna Sts.
Specifically, I cited that the 71 on site parking spaces designated in the permit were not provided when the building was constructed.
In fact, at an April *Transportation and Land Use Committee* at which the 911 Center tried to grab another three hundred feet of curb space to the already 875 feet they red zoned last year, their representative admitted to Supervisor McGoldrick that there were only 43 on site parking spaces.
We know the 911 Center failed to provide 40% of the agreed upon parking spaces.
We know what impact this failure to comply has had on the neighborhood-almost the length of three football fields have been red zoned for employee parking on Turk St.
I would hope the City Planning Department requires from City Buildings the same adherence to the Planning Code that it requires of others.
Please notify me where my complaint stands after 13 months.
Thank you for your time and consideration to my complaint.

Sincerely yours,

James J. Corrigan

66 Vasquez Ave.
San Francisco, CA. 94127
Oct. 10, 2001

S.F. Planning Department
1660 Mission St.
San Francisco, CA. 94103

Dear Mr. Green:
On May 15, 2000 I wrote to you with a formal complaint of non-compliance with the Building Permit obtained by the new 911 Center at Turk & Laguna Sts.
Specifically, I cited that the 71 on site parking spaces designated in the permit were not provided when the building was constructed.
On June 12, 2001 I wrote to you (see attached) requesting on an update on the progress of my complaint.
I received no response from your office.
Please notify me in writing where my complaint stands after 17 months.
Thank you for your time and consideration to my complaint.

Sincerely yours,

James J. Corrigan

911 Center

NEGATIVE DECLARATION

Date of Publication of
Preliminary Negative Declaration: November 4, 1994

Lead Agency: City and County of San Francisco, Department of City Planning
1660 Mission Street, San Francisco, CA 94103
Agency Contact Person: Carol Roos Telephone:(415)558-6389

Project Title: 94.273E: 911 Center

Project Sponsor: Office of the Chief
Administrative Officer
Project Contact Person: Ralph Jacobson
Telephone No.: (415) 554-4847

Project Address: 1003 Turk Street, in Jefferson Square
Assessor's Block(s) and Lot(s): A portion of A/B 759, Lot 1

City and County: San Francisco

Project Description: Construction of a two-story building (about 40 feet tall) containing about 35,600 sq.ft. of office space above a basement containing about 71 employee parking spaces. The facility would combine existing City emergency response dispatch services and would have several components, or functions: 1) Answer all 911 calls; 2) Dispatch appropriate fire, police, and/or other emergency response to 911 calls; 3) Dispatch traffic control assistance (Department of Parking and Traffic [DPT]) for major accidents, marathons, or parades; and 4) Emergency operations: serve as the City Emergency Command Center (ECC) during a major disaster. The facility would also serve as the office of the City's OES (Office of Emergency Services). Following construction of the new facility, the adjacent existing buildings containing the OES/ECC and Central Fire Alarm Station would be demolished after their functions were moved to the new building. Existing basketball and volleyball courts would be affected as they would become the construction site of the new facility, and interim courts would be provided during the construction period. New courts would be provided on the site of the existing Central Fire Alarm Station and OES/ECC, adjacent to the new site, after project completion.

Building Permit Application Number, if Applicable: None yet.

THIS PROJECT COULD NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance) and 15070 (Decision to Prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached:

-Over-

Mitigation measures, if any, included in this project to avoid potentially significant effects:

See p. 14

Final Negative Declaration adopted and issued on November 29 1994
In the independent judgement of the Department of City Planning, there is no substantial evidence that the project could have a significant effect on the environment.

Barbara W. Sahm

BARBARA W. SAHM
Environmental Review Officer

cc: FND Distribution List
Bulletin Board
Master Decision File

OFFICE OF
CHIEF ADMINISTRATIVE OFFICER

RUDOLF NOTHENBERG
CHIEF ADMINISTRATIVE OFFICER

August 16, 1994

289 CITY HALL
SAN FRANCISCO
CALIFORNIA 94102
415/554-4851

Mark Pope
Pam Dannenberg
Mary Louise Frenchman
St. Paulus/San Francisco Organizing Project
950 Gough Street
San Francisco, California 94102

Dear Mr. Pope, Ms. Dannenberg and Ms. Frenchman:

Thank you for your letter of July 22, 1994, concerning the proposed 9-1-1 dispatch center. In it you made four requests that I shall attempt to address. First, you asked if all of the 9-1-1 dispatch center could be placed on the south side of Turk Street rather than on the north side. This is what we are proposing. We are asking the Recreation and Park Department if it is feasible to locate the interim basketball or tennis courts on the north side of Turk, in the park in Jefferson Square. We are also investigating the possibility of staging the construction off site. These actions would allow us to preserve the playing field south of the current Central Fire Alarm Station, but would temporarily take away open park lands.

Second, you requested that all employee parking be placed underground. We are proposing to provide off street, underground employee parking. There should be little, if any, employee parking on the street. In addition, we are looking into the additional costs of placing the entire structure under ground so as to minimize its impact.

Third, you asked that we consider placing this building at another site. Your preference was that the site not be park land. This is a decision that would have to be made by the Mayor and the Board of Supervisors. On May 27, 1994, the Mayor and eleven members of the Board of Supervisors passed a resolution instructing us to build the 9-1-1 dispatch center in the Jefferson Square area on the south side of Turk Street.

Fourth, you asked that Jefferson Park be made a permanent green open space. It is my understanding that a charter amendment would be needed to make this part of Jefferson Square a permanent green open space.

Thank you for your interest in this project and the input you have provided. When I find out more about the possibility of off-site staging and putting the building underground, I shall send you another letter.

Sincerely,

Ralph Jacobson

Ralph Jacobson
9-1-1 Project Manager

)JECT DESCRIPTION AND SETTING

project would construct a new integrated emergency services communications, dispatch and 911 response facility emergency command center for the City and County of San Francisco, and demolish the existing two buildings sing the City Central Fire Alarm Station and Interim Emergency Command Center. The project would provide grated emergency services communications, dispatch and 911 response services in about 35,600 gross sq.ft. of :e space; a 25,700-sq.-ft. basement would include about 71 employee parking spaces, with primary parking access n Turk Street and secondary access from the Octavia Street right-of-way. The net change in built area (excluding king) in Jefferson Square would be about 21,785 sq.ft. (35,600 sq.ft. proposed - 13,515 sq.ft. existing facility = 085 sq.ft.). When the project is operational, the existing buildings would be demolished and their site returned to k use, so the park area lost for the new facility would be replaced at the old site.

June 1994, San Francisco voters approved the funding for this 911 facility. The Board of Supervisors, in May 1994, ntified the preferred site for the new 911 Center for purposes of further study and environmental review as "in ferson Square on the South side of Turk Street as close as is practical to the existing center."[1] The project would nsolidate City dispatch and emergency communications services, now performed at various locations in the City, der one roof. (Please see Figure 1, p. 3.)

e functions of the 911 Center would include four main components: 1) all 911 calls would be answered here instead at the Hall of Justice, the current 911 response center; 2) the appropriate emergency response would be dispatched m the facility including fire, police and other emergency personnel; 3) the project would serve as the City Emergency mmand Center, the center of emergency operations during a major disaster such as a major earthquake; and Department of Parking and Traffic (DPT) dispatch for major traffic control would be located here and would dispatch its for traffic control for major events affecting City traffic. In the future, ambulances may be dispatched from the nter. All dispatch would be electronic only. That is, no fire, police ambulance or other similar vehicles or equipment ould be located at the facility. A Recreation and Park storage area now located at the existing facility would be commodated in the new center.

the absence of a major Citywide emergency, the project would be used as office space for the dispatchers noted ove, Office of Emergency Services personnel, and associated telecommunications and computer personnel. There e expected to be a maximum of about 45 employees at the facility per shift.

ne proposed structure and parking lot would be built in the portion of Jefferson Square containing basketball and lleyball courts and a surface parking lot, directly west of the existing Central Fire Alarm Station building and interim mergency Command Center. An existing approximately 100-ft.-tall tower in the parking lot would be replaced with naller, approximately 20-ft.-tall metal structures for antennas, on the roof of the new building for antennas. (Figures 2 nd 3, p. 4 and p. 5 show existing and proposed site plans.)

he approximately 36,000-sq.-ft. site includes the total area of the proposed new facility and that of the existing Central ire Alarm Station and Interim Emergency Command Center buildings. Both existing buildings would remain in peration until the new facility became operational, when they would be demolished. The basketball and volleyball ourts displaced by the new 911 Center would be relocated on the site where the two existing buildings would be emolished, and that land would be returned to the jurisdiction of the Recreation and Park Department. The resulting roject site of the 911 Center would be about 193.75' x 113.25' = 21,942 sq.ft. The remainder of the block, abutting the ite on the east, south and west, is the Margaret S. Hayward Playground bounded by Turk, Gough, Laguna Streets, nd Golden Gate Avenue. On the north is the site's main frontage on Turk Street. The site and the Playground are art of Jefferson Square which also includes open space to the north of the site across Turk Street, extending to Eddy treet and bounded by Gough, Laguna and Turk Streets. Figure 4, p. 6, shows the massing of the proposed project.

iarter (1898) authorizes the Board of Supervisors to designate land in Jefferson Square for such a purpose ct proposes, and this block of Jefferson Square has historically been used for such purpose, primarily over location of the Central Fire Alarm System for the City and, more recently, the Emergency Command Center. 4, the Board of Supervisors set aside a 100-ft. by 100-ft. area on this block, along the south side of Turk Central station for the Fire Alarm and Police Telegraph and Telephone System, and in the same year additional 30-ft. by 100-ft. area for that use. (Ordinances Nos. 2732 and 2749). The whole of Jefferson nder the jurisdiction of the Recreation and Park Department. An area of 18,810 sq.ft. of the Playground has the control and management of the Department of Electricity (now Department of Electricity and nications, or DET) since 1914, when the Board of Supervisors authorized the establishment of the Central Station in Jefferson Square. In January 1988, the Board extended the area under the control and it of the DET to include the additional land to the east of the Central Fire Alarm Station which contains the . In January 1988, the Board increased the size of this area to 164-'9"x 113'-3" (Ordinance 7-88), and in ncreased it to 193'-9" x 113'3", or about 21,942 sq.ft.

CFAS and ECC occupy about 21,942 sq. ft. as would the project. When the project is operational, the dings would be demolished and their site returned to park use, so the park area lost for the new facility placed at the old site. The size of the southern block of Jefferson Square on which the site is located is 51 sq.ft., and the two blocks comprising Jefferson Square total about 491,562 sq.ft.

oning, the site is in a P (Public) use district. Permitted uses under the City Planning Code (Section 234.1) lic structures and uses of the City and County of San Francisco and other government agencies subject to nning Code "when in conformity with the Master Plan". The project would be a principal permitted use in The site is in an OS (Open Space) height and bulk district. In this district, " the height and bulk of d structures shall be determined in accordance with the objectives, principles and policies of the Master building or structure or addition thereto shall be permitted unless in conformity with the Master Plan. The land in Open Space Districts is intended to indicate its principal or exclusive purpose as open space, with opment of any character strictly limited." (City Planning Code Section 290). Because of its location in a P an OS district, the project must be considered by the City Planning Department to determine its conformity r Plan.

site is surrounded by Jefferson Square for about one-half to one full block in each direction. Turk Street site on the north. The site is in the Western Addition neighborhood of the City, and surrounding t beyond Jefferson Square includes to the north, newer condominiums and a large older apartment complex of Jefferson Square on Eddy Street, as well as a newer residential tower to the northwest. St. Paulus school are along Gough Street between Eddy and Turk Streets east of the site, and the San Francisco /Redevelopment Agency Building is at the corner of Golden Gate Avenue and Gough Street. John Swett ated on Golden Gate and there are some surface parking lots in the area, mostly on Caltrans rights-of-way, rcels vacated due to demolition of part of the Central freeway. To the south are multi-unit residential uses development area housing, and the Bethel AME church is located at the southeast corner of Golden Gate Laguna, across from the children's playground. Uses on the west include the Redevelopment area and st Housing Authority residential towers, planned for demolition and replacement with lower structures. t ranges from about one to thirteen stories in the area.

would be managed and administered by the Bureau of Architecture and the Department of Public Works. would be performed by a private contractor. Because the project would involve construction on City ould be reviewed by the Art Commission. The Board of Supervisors would need to reallocate the land t 21,942 sq.ft. for the new facility and return the approximately 21,942 sq.ft. site of the existing facilities to n of the Recreation and Park Department. That is, there would be a one-for-one land exchange for the project would require approval from the Recreation and Park Commission for location of interim basketball all courts in the southern block of Jefferson Square, to permanently relocate these courts on the site of the les once those facilities are demolished, and for an easement to access and occupy basement area

eath the courts for parking, parking access, fire alarm box wiring terminus in the current CFAS basement, part of ch would remain in order to keep the call box wiring intact. (A portion of the interim ECC basement would also ain and would be used as storage space by Recreation and Park to replace such space displaced by the project.) project would be funded by Certificates of Participation approved by the voters June 1994 as noted above. Project itects are Heller and Leake, Levy Design Partners, and Finger and Moy, Inc.

VIRONMENTAL IMPACTS

e project would replace existing facilities on the site totalling about 13,515 sq.ft. with facilities totalling about 35,600 ft. increasing the size of the facility by about 22,085 sq.ft. Additionally, 25,700 sq.ft. of parking would be provided in asement level (about 71 spaces). The area to be built on would essentially equal the area on which existing ldings would be demolished (about 21,942 sq.ft. for each), that is, the development site would be equal to the molition site. The basketball and volley ball courts would be replaced on a sq.ft. per sq.ft. or one-for-one basis. The oject would intensify the current land use of the site for emergency response and major emergency services. It would t result in a change of use, or in a substantial change in the existing character of Jefferson Square or of the project inity.

e project would increase the scale of the buildings on the site, replacing the CFAS building and ECC, essentially e-story structures, with a building that would be about 40 feet tall, or less, with two floors on the Turk Street frontage. ee Figure 4, p. 6.) Because the site slopes down to the south the rear facade would appear as three floors from olden Gate Avenue. The project would be a building in the midst of open space. It would fall within the range of velopment heights in the project area (from about one to thirteen stories), and the pattern of development which cludes some Recreation and Park structures and the CFAS and interim ECC on the Margaret Hayward Playground outhern half of Jefferson Square. Some concern has been expressed about the design of the project, which is in the arly design phase. The design of the building is not an environmental issue per se, and would be appropriately ldressed as part of the Master Plan Referral process. Views, including public views are available from the site and ross the site from the surrounding area. The project would be more visible than existing structures because it would e larger. It would be seen as one of several structures on this block of Jefferson Square, and would occupy a latively small area within the two-square-block park. In view of the above, the project would not result in a significant mpact on visual quality.

here would be a maximum of about 45 employees on the site during each work shift, selected from a total employee ool of about 200. More people could be on the site briefly during shift changes. For comparison, there are about 17 mployees per shift on the site now, selected from an employee pool of about 43. During a Citywide emergency, more ersonnel would be on site, although the exact number cannot be predicted. These people would be on the site on a emporary basis, during the emergency period. The project would increase the population on the site. While potentially oticeable to immediately adjacent neighbors, this increase would not substantially increase the existing area-wide opulation.

Traffic impacts associated with the project would not be significant relative to the existing capacity of the surrounding treet system. Because of the limited number of new employees which would be located at the site on an everyday asis, the change in area traffic as a result of the project would be undetectable to drivers. The project impact on area parking availability would also not be substantial. During a major emergency, substantially more people would be ocated at the site. During such an emergency it is likely, however, that commuting and transportation patterns would dramatically affected, and that the entire City transportation system would be substantially disrupted. It is not possible o predict or quantify the impact of additional people in the area under such a circumstance. However, in the context of he traffic conditions likely to be experienced during a major emergency (such as a major earthquake), any traffic generated by City employees and others using the Emergency Command Center would not be substantial.

has been expressed about construction staging for the project and possible related interference with childrens' r activities at Jefferson Square. In response to this concern, the project staging plan was changed as follows. ect construction staging area would be on Turk Street, between Gough and Laguna Streets, not on Jefferson as previously planned. During the approximately 18-month construction period, the two parking lanes on this ould be eliminated. Two traffic lanes would remain open. Elimination of the parking lanes would cause parkers Civic Center employees parking in the area to park farther from their destination or to shift to another mode of nd could be an inconvenience for residents of the area. This effect would not be substantial and would be ry, limited to the construction period.

ject sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department ng and Traffic, the Fire Department, and Muni (if appropriate) to determine feasible measures to reduce l traffic congestion and pedestrian circulation impacts during construction of this project and other nearby that are planned for construction or which later become known to manage construction traffic and lane closures imize construction impacts of the project on pedestrian and vehicle circulation to have the least effect on City uring commute hours.

ject would not serve the public directly, and all persons at the site would therefore be employees. The project clude a total of about 71 employee parking spaces, (Planning Code Section 150). Because the required of parking spaces would exceed the number of employees per shift during normal operation, some overlap at shift changes could be accommodated on site. The project would meet its parking requirement. While area is generally occupied during the day, the project would accommodate its parking demand on the site.

transit lines in the area include primarily the Muni 31-Balboa which runs on Eddy about one block from the site ps at Laguna and Gough and the 5-McAllister about two blocks from the site, also with stops at Gough and Streets. The increase in transit demand associated with the project would not noticeably affect transit service rea.

roximate doubling of traffic volumes in the area would be necessary to produce an increase in ambient noise oticeable to most people. The project would not cause a doubling in traffic volumes and therefore would not noticeable increase in the ambient noise level in the project vicinity.

construction, powered equipment other than impact tools would have to comply with the San Francisco Noise nce (Section 2907b) requirement of a sound level of not more than 80 dBA at 100 ft. Any impact tools and ent would have intake and exhaust mufflers, and jackhammers would be equipped with acoustically attenuating or shrouds recommended by the manufacturers and approved by the Director of Public Works as required by 2907c of the San Francisco Noise Ordinance. Construction activities would generally occur between the hours and 5 pm. No construction activity would occur during the hours of 8 pm and 7 am that would cause the noise exceed the ambient noise level by 5 dBA at the nearest property line without a special permit from the Director ic Works. No nighttime construction is planned. Construction impacts would comply with the noise ordinance, uld be limited in duration. Therefore, they would not be substantial.

tion and construction activity would temporarily raise dust levels in the area, but not to a level that would have ant impacts upon air quality. (Please see Mitigation Measure No.2, p. 14-15.)

y Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review ential air quality impacts. These thresholds are based on the minimum size projects which the District considers e of producing air quality problems. The project would not exceed this minimum standard. Therefore, no ant air quality impacts would be generated by the proposal.

oposed project would add new shade to portions of the subject site as well as to surrounding properties. The would not exceed 40 feet in height as measured by the Planning Code, and the proposal would therefore not be

Office of Environmental Review
$25.00 Private Development Fee IS OWED__

NOTICE OF DETERMINATION

X County Clerk, City and County of San Francisco
875 Stevenson Street, Room 100
San Francisco CA 94102

Pursuant to the California Environmental Quality Act (CEQA), the Guidelines of the Secretary for Resources and San Francisco requirements, this Notice of Determination is transmitted to you for filing. At the end of the posting period, please return this Notice to the Contact Person with a notation of the period it was posted.

File Number and Project Title: 94.273E: 911 Center
Address: 1003 Turk Street, in Jefferson Square.

Project Description: Construction of a two-story building (about 40 ft. tall) with about 35,600 sq.ft. of office space above a basement containing about 58 employee parking spaces. The facility would combine City emergency response dispatch services including: 1) Answer all 911 calls; 2) Dispatch fire, police, and/or other emergency response to 911 calls; 3) Dispatch traffic control assistance (Department of Parking and traffic, DPT) for major accidents, marathons, or parades; and 4) Emergency operations: serve as the City Emergency Command Center (ECC) during a major disaster. The facility would also serve as the office of the City's Office of Emergency Services (OES). Following completion, the two adjacent buildings now housing the OES/ECC and Central Fire Alarm Station would be demolished.

Lead Agency: City and County of San Francisco, Department of City Planning,
1660 Mission Street, San Francisco CA 94103-2414

Contact Person: Carol Roos **Telephone: (415) 558- 6389**
Project Applicant: Office of the City Administrator

The City and County of San Francisco issued a building permit based on permit Application Nos. 09617032 issued on _____. Permit and construction documents may be examined at:
X Central Permit Bureau, 1660 Mission Street, San Francisco, CA 94103
__ Board of Permit Appeals, 875 Stevenson Street, Room 440, San Francisco, CA 94103.

1. An environmental document has been prepared pursuant to the provisions of CEQA, as noted below. It is available to the public and may be examined at the Office of Environmental Review at the above address.
   __Certificate of Exemption
   X Negative Declaration
   __Environmental Impact Report
   __Supplemental Environmental Impact Report

2. A determination has been made that the project in its approved form
   X will not have a significant effect on the environment.
   __will have a significant effect on the environment and findings were made pursuant to Section 15091 and a statement of overriding considerations was adopted.

3. Mitigation Measures X were__were not made a condition of approval.

Sincerely,
Gerald G. Green
Director of Planning

Paul A. Deutsch /for

by Hillary Gitelman
Environmental Review Officer

Sincerely,

Frank Chiu, Director
Department of Building Inspection

cc: Sue C. Hestor 870 Market St. #1121, San Francisco CA 94102
Ann Simon, Environmental Law Community Clinic, 3122 Shattuck Avenue, Berkeley, CA 94705
Project Sponsor: Deborah Vincent-James, E-911 Project, Office of the City Administrator, 875 Stevenson Street, 5th Floor, San Francisco, CA 94103

EIR

ENVIRONMENTAL EVALUATION CHECKLIST
(Initial Study)

File No: 94.273E Title: 911 Center

Street Address: 1003 Turk St Assessor's Block/Lot: Portion of A/B 759 lot 1

Initial Study Prepared by: Carol Ross

A COMPATIBILITY WITH EXISTING ZONING AND PLANS	Not Applicable	Discussed
1) Discuss any variances, special authorizations, or changes proposed to the City Planning Code or Zoning Map, if applicable.	—	✓
2) Discuss any conflicts with any adopted environmental plans and goals of the City or Region, if applicable.	✓	—

B ENVIRONMENTAL EFFECTS - Could the project:	YES	NO	DISCUSSED
1) Land Use			
*(a) Disrupt or divide the physical arrangement of an established community?	—	✓	✓
*(b) Have any substantial impact upon the existing character of the vicinity?	—	✓	✓
2) Visual Quality			
*(a) Have a substantial, demonstrable negative aesthetic effect?	—	✓	✓
(b) Substantially degrade or obstruct any scenic view or vista now observed from public areas?	—	✓	✓
(c) Generate obtrusive light or glare substantially impacting other properties?	—	✓	✓
3) Population			
*(a) Induce substantial growth or concentration of population?	—	✓	—
*(b) Displace a large number of people (involving either housing or employment)?	—	✓	—
(c) Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	—	✓	—
4) Transportation/Circulation			
*(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	—	✓	✓
(b) Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	—	✓	✓

Derived from State EIR Guidelines, Appendix G, normally significant effect.

EIR

	YES	NO	DISCUSSED
(c) Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	—	✓	✓
(d) Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	—	✓	✓
5) Noise			
*(a) Increase substantially the ambient noise levels for adjoining areas?	—	✓	✓
(b) Violate Title 24 Noise Insulation Standards, if applicable?	—	✓	—
(c) Be substantially impacted by existing noise levels?	—	✓	—
6) Air Quality/Climate			
*(a) Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	—	✓	—
*(b) Expose sensitive receptors to substantial pollutant concentrations?	—	✓	—
(c) Permeate its vicinity with objectionable odors?	—	✓	✓
(d) Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	—	—	—
7) Utilities/Public Services			
*(a) Breach published national, state or local standards relating to solid waste or litter control?	—	✓	—
*(b) Extend a sewer trunk line with capacity to serve new development?	—	✓	—
(c) Substantially increase demand for schools, recreation or other public facilities?	—	✓	—
(d) Require major expansion of power, water, or communications facilities?	—	✓	✓
8) Biology			
*(a) Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	—	✓	—
*(b) Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	—	✓	—
(c) Require removal of substantial numbers of mature, scenic trees?	—	✓	✓
9) Geology/Topography			
*(a) Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction).	—	✓	✓
(b) Change substantially the topography or any unique geologic or physical features of the site?	—	✓	—

	YES	NO	DISCUSSED
10) Water			
*(a) Substantially degrade water quality, or contaminate a public water supply?	—	✓	—
*(b) Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?	—	✓	—
*(c) Cause substantial flooding, erosion or siltation?	—	—	—
11) Energy/Natural Resources			
*(a) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	—	✓	—
(b) Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	—	✓	—
12) Hazards			
*(a) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	—	✓	✓
*(b) Interfere with emergency response plans or emergency evacuation plans?	—	✓	—
(c) Create a potentially substantial fire hazard?	—	✓	—
13) Cultural			
*(a) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?	—	✓	✓
(b) Conflict with established recreational, educational, religious or scientific uses of the area?	—	✓	—
(c) Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	—	✓	✓

OTHER	YES	NO	DISCUSSED
Require approval and/or permits from City Departments other than Department of City Planning or Bureau of Building Inspection, or from Regional, State or Federal Agencies?	✓	—	✓

MITIGATION MEASURES	YES	NO	N/A	DISCUSSED
1) Could the project have significant effects if mitigation measures are not included in the project?	✓	—	—	—
2) Are all mitigation measures necessary to eliminate significant effects included in the project?	✓	—	—	—

MANDATORY FINDINGS OF SIGNIFICANCE

		YES	NO	DISCUSSED
*1)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?		✓	
*2)	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		✓	
*3)	Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)		✓	
*4)	Would the project cause substantial adverse effects on human beings, either directly or indirectly?		✓	

ON THE BASIS OF THIS INITIAL STUDY

___ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

/ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers 1-2, in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

___ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Barbara W. Sahm

BARBARA W. SAHM
Environmental Review Officer
for

LUCIAN R. BLAZEJ
Director of Planning

DATE: 11/3/94

BWS:OER/23/4-13-92

and County of San [illegible]ncisco
[illegible]partment of Public Works
Bureau of Architecture

RECEIVED
OCT 26 1994
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

smittal

Ms. Carol Roos
Department of City Planning
1660 Mission Street
San Francisco, CA

cised:

Letter/Memo | Plans | Samples
Meting Notes | Specs
Other: revised 9-1-1 Project Description chart for Environmental Evaluation;
shadow study calculations / assumptions;

smitted as Checked:

For Information | X As Requested | Return for Correction
For Approval | Approved as Submitted | Return to Us
For Review and Comment | Approved as Noted | Resubmit for Approval
Other

arks:

ttched are the newly revised Environmental Evaluation Application Project Description chart (which I xd to you on Monday 10.24) and the solar time calculations / assumptions used to generate the adow studies that I left with Rana Ahmadi.

e items changed on the Project Description chart:
The height description of the new building was changed to a single figure: 40' at the Turk Street ront.
The Site Size item was qualified with a note regarding the construction site size versus the final, inished project site size (i.e. no net change in final site area used);
The number of parking spaces was increased from 70 to 71.

ou have any more questions regarding the project or our application, I would be glad to answer them oryou (tel. 557.4673).

n Schroeter, BOA

man M. Karasick
y Architect

ribution:
n. File Gary Hoy
ect File 1001H

9-1-1 Emergency Dispatch Center
ation 1003 Turk Street, San Francisco, CA
Number 1001H
10. 26. 94
inter-office mail

(415) 557-4700 30 Van Ness Avenue, Suite 4100 San Francisco 94102

San Francisco 9-1-1 Emergency Dispatch Center
Department of City Planning
Environmental Evaluation Application

I. Project Description

Category	Existing Uses	Existing Uses to be Retained	New Construction and/or Addition	Existing Space Converted to Other Use	TOTALS
Office Gross Square Footage (GSF)	13,295 sf		35,600 sf		35,600 sf
Retail GSF					
Residential GSF					
Other GSF - specify use	basketball, volleyball courts; 220 sf garage	basketball, volleyball courts	25,700 sf covered parking, incl. area below b'ball courts		25,700 sf
TOTAL GSF	13,515 sf		61,300 sf		61,300 sf
Dwelling Units					
Hotel Rms.					
Parking Spaces	18	0	71		71 spaces
Loading Spaces					
Height of Bldgs.	25' @ north side 33' @ south side		40' @ Turk Street*		
No. of stories	2		2 + basement		2 + basement
Site Size	36,000 sf***		36,000 sf***		36,000 sf***
No. of Bldgs.	3	basketball, volleyball courts	1		1
Structures to be demolished	CFAS; CFAS garage; ECC; basketball courts**				
Other features not described above					

* by Planning Code definition, not including exempted structures;
** The existing basketball / volleyball courts are to be demolished and replaced with new courts; the ECC foundation/basement + the north half of CFAS foundation/basement are to be retained below the new basketball / volleyball courts;
***During construction, the project site will encompass an area of 36,000 sf (318' x 113.25'), which includes the CFAS + ECC site (21,942 sf) and the basketball and volleyball courts (14,058 sf);
At completion, the 9-1-1 Center site area will be 21,942 sf (193.75' x 113.25'), equal to the present CFAS + ECC site area;
The other 14,058 sf will then be returned to the Recreation & Parks Department as new basketball and volleyball courts;

Fire Dept.
2nd - Townsend
B

FINDINGS:

FINDING 1. That there are exceptional or extraordinary circumstances applying to the property involved or to the intended use of the property that do not apply generally to other property or uses in the same class of district.

REQUIREMENT MET.

- The facility currently has eighteen Fire Prevention Inspectors sharing eleven Fire Department vehicles. The existing facility has no off-street parking for the vehicles. The staff will increase to approximately 50 employees when the building become the headquarters for the Fire Department. The project sponsor proposes to provide 19 spaces within the building to serve the employees.

- The subject building is listed by the Department of City Planning as a Contributory building within the South End Historic District, which means that the existing building has special character, and special architectural and historical interest and value. Therefore, any substantial alteration to the facade of the subject property would adversely affect its Contributory value. The renovation and conversion are mainly within the existing building envelope. Additional alterations necessary to accommodate additional parking spaces beyond those proposed would adversely affect the visual significance of the building.

- The Fire Department is currently in the process of purchasing a new multi-purpose facility at 1415 Evans Avenue (3rd Street and Evans Avenue), approximately 5-10 minutes away from the subject property; that facility has ample open, off-street space that can accommodate the extra parking needed for the new Headquarters facility. The Evans Avenue facility has approximately 28,000 square feet of paved yard space and can accommodate 53 parking spaces to serve both facilities. A shuttle system will be provided to transport employees between the Evans Avenue facility and the new Headquarters building. The owner has an accepted offer by the Department of Real Estate for the Evans Avenue property and the purchase is currently being finalized.

FAILED TO PERFORM

- The subject site is well served by public transit, with a number of nearby bus lines operated by MUNI and other carriers providing service throughout San Francisco and the region.

- The subject building is the only publicly owned building in the vicinity suitable for accommodating the subject use.

Midtown Terrace
Homeowners Association
P.O. Box 31097
San Francisco, CA 94131
(415) 675-5864

January 12, 2002

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Subject: Draft Environmental Impact Report
Laguna Honda Hospital Replacement
File No. 2000.005E

Dear Mr. Maltzer:

We, the Board of Directors of this Association of homeowners, appreciate the opportunity to submit our comments to the subject report. We support the purpose, aims and basic characteristics of the project, and are confident that its design is consistent with the highest professional standards appropriate today for such an essential municipal medical facility of civic prominence.

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Appropriately shown by several maps in the report, Midtown Terrace is located east and northeast of the project site. It encompasses over eight hundred (800) detached single family homes—some thirty (30) of these properties contiguous to the eastern boundary of the project's campus.

The bulk of our comments relate to the proposed measures intended to mitigate the impacts to the adjacent neighborhoods—including ours. In reviewing, and responding to, our comments, we anticipate that you will objectively recognize their relevance to our neighborhood, and, in some cases, to that of nearby ones and/or the users of the public open space of the facility.

1.0 SUMMARY

Our comments concern six (6) categories: Construction Noise; Visual Quality; Land Use-Open Space; Hazards; Proposed Site Plan; and Traffic Impacts.

By definition and in effect, Construction Noise is limited to certain times of the construction period; conversely, visual quality, use of open space, hazards, and cumulative traffic affect now, and will affect, the quality of life both during the 8-year construction period and the time after the project is completed.

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Therefore, we urge you to take the broad view in these three categories not only in terms of population segments affected, but also in the range of time frames. In other words, where visual and use of open space problems exist already on day one of the project, mitigation needs to begin then rather than at the end of the semi-permanent construction period. And where long traffic delays and safety hazards are present now, and are projected to be increased by construction trucks and cumulative volumes contributed to by project-generated automobile traffic, mitigation needs to begin at the earliest possible time.

71

2.0 CONSTRUCTION NOISE

Table 3.4-4 (page 3.4-11) and Table 4.0-1 (page 4.0-4) show in their respective sections for Phase Three-B (G-H), in the column for Receptor Location, the distance of 250 feet between the closest residential receptor on Dellbrook Avenue and the construction site, evidently the north end of Wing O scheduled for demolition.

Conversely, in the column for Actual Distance, that distance is given as 475 feet, which appears to be based on the distance between those receptors and (not Wing O but) the to-be-built Assisted Living Facility.

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Impact Equipment and Trucks (and possibly other noise generating equipment) would be involved in the demolition of Wing O. Therefore, the Actual Distance between these noise sources and the receptors on Dellbrook Avenue is 250 feet. Consequently, the Distance Adjustments should be –14 dBA, rather than –20 dBA, leading to the following needed corrections of dBA values:

Adjusted Leq – Trucks	: 77	(instead of 71)
Adjusted Leq – Impact Equipment	: 74	(instead of 68)
Mitigated Leq – Trucks (a)	: 61	(instead of 55)
Mitigated Leq – Impact Equipment (a)	: 66	(instead of 60)

(a): Table 4.0-1 only

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Given that the highest estimated unmitigated noise level generated by trucks (77 dBA) would come critically close to the Speech Interference Criterion of 80 dBA, the results of the claimed effectiveness of the attenuation devises to be used will need to be rigorously monitored. If requested, these results need to be made available to concerned homeowners.

79

We request that the list of persons to receive the advance notifications giving them the name and phone number of the Designated Complaint Coordinator (mentioned on page 1.0-11 and 4.0-3) include, as a minimum, all residents living at locations at which the mitigated construction noise is expected to exceed the ambient noise level, during a given phase, by 5 dBA or more. We further request that this Coordinator also be similarly responsible for monitoring compliance with the guidelines established by the Bay Area Air Quality Management District (BAAQMD), especially to ascertain that levels of wind-blown dust are well below threshold levels. (See page 4.0-13.)

3.0 VISUAL QUALITY: EXISTING CONDITION AND PROJECT IMPACTS

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3.1 The site—partially or entirely—<u>is</u> visible from many homes in Midtown Terrace, primarily from many of those located on its west-facing terraced portion. Section C-2 (page 3.3-3) includes the statement "the site is not visible from the neighborhood areas to the north and east...". Figure 3.3-4 (page 3.3-7) clearly shows that this statement does not correspond to fact: the homes in the right to middle foreground are located on Starview Way, Knollview Way, Starview Way and Panorama Drive on that terraced portion.

Of course, view of the site from these <u>streets</u> is not possible, simply because the houses block it. But it <u>is</u> possible from the living rooms of many of these homes. Short of asking for permission to visit some of these homes, one can go to the gap between #19 and #47 Knollview Way which provides a view of part of the site which is similar to the views from nearby homes. (Clarendon Hall is in plain view; all seven stories of the proposed Clarendon Hill West building will be in full view from there.) We suggest that the quoted statement on page 3.3-3 be amended accordingly, and that the numerous statements in the report mentioning views from "Twin Peaks Park" be expanded to include at least that terraced portion of Midtown Terrace.

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The judgment of whether any changes of the view of the site from the west slope of Twin Peaks are significant and adverse is one for the individual homeowners to make. At any rate, since they will—or will not—enjoy these views perennially, their opinions—expected not to be unanimous—should be more relevant than those of the occasional hiker or cyclist on Twin Peaks Park.

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3.2 A situation which in several respects is different from the preceding one exists on the portion of Dellbrook Avenue contiguous to the eastern boundary of the campus. Section C-3 (page 3.3-8) includes the statement "Views from Dellbrook Avenue are generally blocked by the houses along the roadway, but the trees along the eastern project boundary buffer views towards the project site from behind the homes." The qualifier in this statement can be attributed to the fact that there is at least one large gap in that line of trees, the one west of #56 to #64 Dellbrook Avenue. This gap is noticeable on Figure 3.3-4 (page 3.3-7) baring the Bridge Structure, and much wider than indicated on Figure 2.0-4 (page 2.0-13). As shown on the attached copy of a photograph taken on December 15, 2001, the gap affords the view of part of the project site, notably the area east of the MUNI substation that serves as a parking lot for assorted vehicles and a huge pile of eradicated, desiccated blackberry bushes and other trash. Given the more elevated location of the homes there, the project sponsor needs to mitigate this avoidable visual impact by planting, in the gap and west of the boundary, fast growing, tall trees (e.g., conifers) and shrubbery. That needs to be done not "prior to final project completion" (page 1.0-9, and page 4.0-1) but during Week 1 of Phase A of Phase One.

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3.3 The size of the satellite dishes currently located just east of the MUNI substation (Appendix 2.0-2, Phase B diagram) is such (see above mentioned photograph) that when relocated (Section E4(a), page 2.0-16) to their new site in the (south-) eastern part of the campus near the water tanks (Figure 2.0-4, page 2.0-13) they are likely to create a visual impact for a number of homes on Dellbrook Avenue and/or Panorama Drive.

That impact needs to be evaluated. If found to be significant and adverse, its mitigation—or a less intrusive alternate location—will need to be specified.

4.0 LAND USE: OPEN SPACE

13 4.1 The Open Space (OS) height and bulk district constitutes about one half of the project area, while (building) construction is projected to be contained within the 80-D height and bulk district, the other half of the campus. However, accessibility to the outdoors is a project objective, and fire hazards are a potential impact which overlaps both districts. The two issues need to be addressed in the report.

72 Also, a determination needs to be made as to the extent to which the needed mitigation measures are within the scope of the project or within the responsibility of (other) public agencies. (See page 4.0-1.)

4.1.1 Access to the open space areas needs to be retained and maintained during the construction period and, after having been enhanced (item 7, page 2.0-8), when construction has been completed. That access to the outdoors is—primarily but not exclusively—for the use and benefit of the residents (item 12, page 2.0-3). But it is also for that of the staff, the visitors of the residents, and the public at large. For members of the staff—the brains, lifeblood and muscle within the existing and the to-be-built structural shells—that accessibility represents an opportunity to relax, during their breaks, in communion with nature, and a respite from their at times stressful duties.

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Construction activities during many project phases will disrupt or eliminate the use of or access to certain outdoor facilities such as that of the "picnic" area northwest of Clarendon Hall during Phases C through G (6 years, 2003-2009). Therefore, general guidelines for the relocation of those facilities and for the realignment, reactivation and/or maintenance of safe trail segments need to be included in the report.

4.1.2 In the course of mitigating fire hazards during the permit review process (see Initial Study, page 44), attention needs to be given to distressed, dense stands of smaller eucalyptus trees which, together with the debris accumulated on the ground provide kindling and fire ladders. (The Mount Sutro Open Space Reserve Management Plan, May 2001, prepared by UCSF, contains many details regarding hazardous conditions peculiar to this type of urban forest and their management. We have contributed to the formulation of that

94

Note to Reviewers: This comment needs to be added to Comment 94

plan, and a copy of it has been provided to the Hospital administration.) In this respect, the stand of trees between the east parking lot and Panorama Drive is probably the most hazardous one in the OS district. Thinning it would not only reduce the hazard, but also improve forest health. Also, consideration needs to be given to performing such an operation before or concurrent with the expansion of the construction zone/80-D district in that area for the installation of the satellite dish (see Figure 2.0-4, page 2.0-13).

Relatively free standing mature (eucalyptus) trees are generally less of a fire hazard, but are hazards if diseased, rotting, leaning, etc. and in danger of falling or losing limbs. Their condition needs to be evaluated in the course of the relocation/reactivation of outdoor facilities advocated above—if not earlier.

4.2 Section 101.1 of the City Planning Code established eight (8) Priority Policies. One of these is the Preservation (Section D3, page 3.1-8) and/or Protection (Initial Study, page 14) of Open Space.

The Proposed Construction Phasing Plan (Section E4, pp 2.0-16 through 19) specifies that crushed concrete and dirt from the buildings demolished during Phases One, Two, and Three-A would be placed at given locations within the 80-D heights and bulk district.

14

That Plan also needs to specify where such broken concrete, etc. from Wings D, E, F, G, K, L, M and O, to be demolished during Phase Three-B, would be placed.

Placing such landfill debris in the Open Space area—such as the generally pristine northern part—would violate the intent and spirit of the Priority Policies. The fact that part of the north-facing hillside, north of the parking area east of Clarendon Hall, has been used as a dump site for debris, bottles, old metal furniture, tires, etc. is reason for allowing for the possibility that the reactivation of such practices may have been contemplated. This issue needs to be addressed.

4.3 The area proposed to be transferred from the Open Space to the 80-D height and bulk district as a result of the "minor" adjustment of the boundary line between these two districts (per pages 1.0-4 and 2.0-20) needs to be quantitatively defined.

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Comparison of the location of the existing 80-D/OS boundary line (Existing Site Plan, page 2.0-7) with that of the Limit of Construction Boundary (Proposed Site Plan, page 2.0-13) yields a rough estimate that this area would total about four (4) acres, or about 13% of the present OS area.

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That area would be composed of about 2 acres of the proposed parking lots northwest of Clarendon Hall, about 1.5 acres at the east end of Clarendon Valley, and about 0.5 acre in the southeast panhandle, set aside for the private satellite dishes. This installation would not constitute a public necessity but would be located in a Public Use zoning district.

Also, the proposed amendments of the Zoning Map and the General Plan, by removing that acreage from the Open Space district, would appear to be in violation of Section 101-1 of the City Planning Code, specifically its Priority Policy mandating the preservation/protection of open space. But if such amendments can take precedence over the Code, what are the safeguards against using them as precedents justifying future zoning revisions not just from Open Space to other districts, but from Public Use to non-public uses? This issue needs to be addressed explicitly.

19

5.0 HAZARDS

5.1 The dump site in the northern part of the Open Space area, referred to under item 4.2, above, is located outside the limits of construction. Therefore, it is not included in the area proposed for Hazard Mitigation Measures per Section 4-D (page 4.0-11) which limits such measures to "...areas...subject to ground disturbance during site development activities...." The area of that dump site, as well as any other areas on the campus—whether inside or outside the construction perimeter—which are known or suspected to have been contaminated need to be added to the list of areas to be sampled.

67

5.2 The Refueling Station and Underground Storage Tanks, as shown on the Site Plan (page 2.0-13) and the Phase B plan, would be located within less than 200 feet of the closest homes on Dellbrook Avenue, and at an elevation higher than some homes on that block. The report needs to state what safeguards would be incorporated in that installation to minimize the risk of tank rupture—and consequent leakage, contamination and fire danger—in case of a major earthquake. Also, what alternative site(s), farther removed from

2

residences, have been considered, and the reason(s) for their rejection.

6.0 PROPOSED SITE PLAN

The Proposed Site Plan (Figure 2.0-4, page 2.0-13) shows, at the (south) eastern panhandle of the site, a northerly bulge extending into the private properties of #s 154, 160 and 166 Dellbrook Avenue, and #s 201 through 227 Panorama Drive. Unless such a transfer to properties has taken place or is planned, this apparent drafting error needs to be corrected.

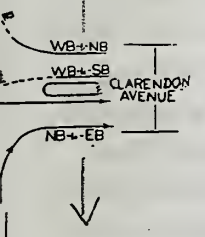
7.0 TRAFFIC IMPACTS AT THE CLARENDON AVENUE/LAGUNA HONDA BOULEVARD INTERSECTION

7.1 The Laguna Honda Boulevard-Seventh Avenue corridor, from its intersection with Woodside Avenue and Dewey Boulevard in the south, to its intersection with Lawton Avenue in the north, is the major south-to-north arterial link in central San Francisco running generally parallel to 19th Avenue in the west and Portola Drive-Market Street to the east.

Between the signalized ("Jug Handle") intersection in front of the MUNI station and the signalized intersection at Lawton Avenue, it is an eight-tenths (8/10) of a mile long, free-flowing (no signals, no stop signs) pipeline carrying high peak period traffic volumes at speeds substantially in excess of those on its contributing arterial network.

7.2 Clarendon Avenue is an arterial which serves not only as a link between southwest and north-central San Francisco, but is also the main access to the Laguna Honda corridor for most of the Midtown Terrace and Forest Knolls neighborhoods, for the Galewood and The Woods enclaves, and Clarendon School.

7.3 The arterial-to-arterial T-intersection of Clarendon Avenue with Laguna Honda Boulevard is **not** signalized. Controlled by stop signs, the westbound-to-southbound (WB-to-SB) traffic and the southbound-to-eastbound (SB-to-EB) traffic intersect with each other and with the higher speed northbound-to-northbound (NB-to-NB) traffic on Laguna Honda Boulevard which they have to cross taking turns when gaps open up in that traffic flow.



That results in queuing in both crossing lanes during both PM and AM peak hours, ever longer delays and a major traffic hazard at the point of triple intersect.

7.4 The Traffic Engineering Division of the Department of Parking and Traffic needs to conduct a thorough analysis and detailed peak period and off-peak field surveys of this intersection with a view to improve its level of service and mitigate the traffic hazard by signalizing it.

22

7.5 Traffic conditions at this intersection are bound to worsen, due both to the projected yearly increase of cumulative volumes and to the projected hospital and construction traffic. As part of that analysis, a determination would need to be made as to the extent to which the envisioned mitigation is within the scope of the Laguna Honda Hospital Replacement Project or within that of the responsibilities of the Parking and Traffic Department. (See page 4.0-1.)

7.6 The following points corroborate the need to improve this intersection:

7.6.1 Implicit in the trip distribution percentages enumerated on page 3.2-17, 18.6% of the work trips and 28.5% of the visitors' trips generated by the project would be to/from the north. They would therefore contribute to the cumulative omnidirectional traffic demand at the Clarendon/Laguna Honda intersection which per Section D2 (c), page 3.2-26 would operate poorly.

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7.6.2 During the peak hours, when the northbound signal at the MUNI ("Jug Handle") intersection is on green, there are no safe gaps in that traffic flow, and queues form and lengthen at the two stop sign-controlled crossing lanes at the Clarendon/Laguna Honda intersection. Towards the end of the AM peak period, that congestion is aggravated by traffic due to parents returning from taking their children to Clarendon School.

7.6.3 The unsafest condition develops after the northbound "Jug Handle" signal turns to amber. There will be a few stragglers, one or two buses from the "Jug Handle" bypass, and a few cars coming out from Plaza Street. Gaps of various lengths develop, but they will be too few since the red cycle is shorter

than the green. Traffic from the queued-up lanes will take their turns, or be hesitant or aggressive about it, sometimes coming to a stop close to the fast through lane. Only half of the queue may get across before the next green platoon arrives, and the queues will lengthen. During school days and under high employment conditions, delays (in the westbound-to-southbound movement) of two minutes or more are not unusual.

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7.6.4 The consultant's traffic study appears to have been made prior to January 2001 when construction of the pump plant and the water mains caused realignments, repaving and unusual traffic conditions on Laguna Honda Boulevard. Field surveys of the Clarendon/Laguna Honda intersection, if conducted during that construction period, may well have produced atypical results.

To conclude, we want to reiterate that we support the project, and that the above constructive comments are submitted respectfully and in the anticipation that they will be given active consideration in the interest of mitigating the project's impact on the quality of life of all persons concerned, and of improving and preserving the characteristics of the facility and its open spaces.

Thank you for your interest in this project.

Sincerely,

Gilbert De La Mora, President

Jon Ridenour, Vice President

Solange Berg, Board Member

Gertrude Kin, Board Member

Ernest Kohn, Board Member

Anne Poirier, Board Member

Timothy Poirier, Board Member

Leslie Rall, Support Volunteer

Jeffrey Silverman, Board Member

George Wooding, Board Member

Attachment: Photocopy (in color)

cc: Supervisor Tony Hall
Bud Wilson
Michael Lane, P.E.
West Portal News
Interested Parties
Files

Laguna Honda Hospital Campus

EAST END OF CLARENDON VALLEY

View from #60 Dellbrook Avenue
Looking West

(Color Print 12/15/2001)

St. John's United Church of Christ

501 LAGUNA HONDA BOULEVARD
SAN FRANCISCO, CALIFORNIA 94127
(415) 731-9933

PASTOR
ROGER RIDGWAY

January 13, 2002

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Subject: Comments to DEIR
Laguna Honda Hospital Replacement Project

Dear Mr. Maltzer:

Following are the St. John's/St. Brendan's Local Organizing Committee comments to the Draft Environmental Impact Report prepared for the Laguna Honda Hospital Replacement Project. These comments are submitted per your notice dated December 1, 2001.

General Comments

90 We are very concerned about the process used to solicit public input on potential project impacts as part of the CEQA scoping process. St. Johns submitted comments to the planning department as part of the development of the Initial Study. These comments are documented in a letter to Ms. Lisa Gibson of the San Francisco Planning Department dated July 2, 2000. These comments were not specifically referenced in the Initial Study or in the DEIR. St. Johns provided additional comments to the Initial Study in April 2001. There was no public scoping meeting. There were limited public outreach (mailings) notifying residents of preparation and publication of the initial study. Please describe the reasons for not holding public scoping meetings, not including or referencing St. John's July 2000 and April 2001 comments, and why the first mailing to local residents with information regarding the CEQA process, was the completion of the DEIR.

1 The project description provides very few details on the types and sequencing of construction activities as it relates to the potential impacts. For example, the types of materials that will be used in the new construction, especially concrete, and how concrete will be delivered to the site, what the largest anticipated pours will be and the number of trucks associated with each pour will be is not provided. The DEIR indicates that some

1 construction debris will be reused but does not provide the estimated quantity relative to what will be hauled off site or disposed of (as opposed to reused) on site. This makes it very difficult to assess project impacts. The project description needs be expanded and detailed.

73 The mitigation section does not provide detail on how mitigations will be documented or enforced. This is a major weakness in the text and needs to be addressed. Specifically, whether mitigations are included in project plans and specifications or other document, who is responsible for approval or oversight of the mitigations (contractor and/or City staff), how compliance will be documented, and consequences of non-compliance need to be included.

Specific Comments

5 p. 1.0-3: A4 Proposed Project : The project elements should include improvements to access as outlined in the Bond measures. Access should be reflected in the integration of the institutional scale of the project with the surrounding residential scale of the neighborhood. Item 7, beautification of campus features visible to neighboring areas, is not discussed or defined in the following description of the project. What project elements address item 7?

38 p. 1.0-5: B2 Transportation, Circulation, and Parking: The DEIR states that the project will result in a worsening of operation conditions at specific intersections. What are the subsequent impacts to air quality? How was the increased traffic percentage of 3% to 4% determined at these intersections and what is the basis for asserting that this level of increase is not a significant impact?

68 p. 1.0-8: B6 Hazards: The text indicates that soil contamination has been identified on site. Where is it relative to proposed building footprints and construction areas?

73 p. 1.0-10: Construction Noise: Who will conduct the noise monitoring outlined as a mitigation measure, the contractor, City or third party? Who will determine if feasible measures have been implemented? Is a noise abatement plan required of the contractor? Who will approve it and monitor its implementation? How will work be coordinated with the hospital staff? Who will be responsible, the City or the Contractor?

80 p. 1.0-13: C3 Historic Architecturally Resources, 2.): How will salvage operations be sequenced with the demolition? Who will be responsible, the contractor or a third party?

84 p. 1.0-14, 15: Hazards: The test indicates that sampling and remediation will be completed in areas where contamination is suspected prior to construction. Who will do this and when in the work sequence. What is the estimated volume of

Comments to DEIR
Laguna Honda Hospital Replacement Project
January 13, 2002
Pg 3

24 potentially contaminated soils that could be encountered? What are the suspected contaminants of concern? Where in the text is the description of site geology and groundwater? Are the referenced tanks formally and appropriately closed?

3 p.2.0-3: Project Objectives: Why is access limited to residents to the outdoors in item 12 and what is the definition of 'outdoors?' Does it include access to the surrounding neighborhood and access for workers, visitors and volunteers to the Hospital from the neighborhood?

1 p. 2.0-5: " a retaining wall of approximately 1,000 feet length…traverses the Woodside Avenue project boundary." This is the only mention of the wall in the EIR, although we understand that portions of the wall will be removed to accommodate ADA access to and from the site. Please clarify whether modification of this wall is included in the project scope and the design basis for the modifications, i.e. Improved access and project integration.

5 p. 2.0-8: "Project Characteristics, #7: beautification of campus features visible to neighboring areas." All the vantage points considered are from higher elevations only. Why? If modifications to the wall along Woodside are included to improve access and construct ADA access, why wasn't wall evaluated relative to this project objective?

10 p. 2.0 –18: "Access Routes" Descriptions fail to note that a left-hand turn isn't possible at 7th Avenue. In addition, there is no San Jose Avenue exit from I-280 South (eastern access rte.). Monterey Blvd exit is a difficult exit to negotiate, requiring a hard right turn to reach O'Shaughnessy Blvd. Please clarify the number of vehicles, especially the types of construction vehicles that will be expected on each proposed route. In particular the length and weight of each type of vehicle should be noted relative to the radius of the turns and the potential for trucks to veer into the on-coming traffic lanes creating a safety hazard.

12 p. 2.0 –22: "Art Commission Review" How does this review include criteria for access as it relates to the ADA access planned on Woodside Ave. and the integration of the institutional scale of this project with the residential scale of the surrounding community. Please define aesthetic merit and how it applies to the view from Woodside Ave. and Laguna Honda Blvd.

48 p. 3.2-1: "A. Summary" Under the Transportation, Circulation and Parking section and based on preliminary construction plans, "truck traffic would range from an average of 7 trucks per day to a PEAK of 15 trucks." Our preliminary analysis breakdowns as follows:

G/C supervisory vehicles	20–30(1/2 ton. To 1tn. Trks.)
Concrete Pour of 200 to 325 CY	25–40 (cycling in/out of LHH)

Architectural Constr. (M/E D/W, etc)	50 (100 workers with 2/car)
TOTAL	95 – 120

48 The DEIR does not describe how it calculated an average and peak level of truck traffic into and from the site. It does not describe the type of trucks that will be used; it does not describe the construction in enough detail to understand the types of construction materials that will be used, how they will be brought to the site, and placed and when the major delivery of materials will occur. This information should be included so the reader can understand the basis for statements made in the report.

16 p. 3.1-7/8: "General Plan Elements" How does the residence element link to the integration of the facility with the surrounding community, especially considering that the project will expand services provided at the hospital?

17 p. 3.1-9: "Planned and Approved Land Uses" This section mentions that no other major projects are planned in the project vicinity when there is a construction project at the corner of Woodside and Portola, the Youth Guidance Center is in the final design stages of a 3 to 4 year construction project and the San Francisco Water Department is constructing improvements to the Mid-Town Terrace Reservoir. In addition, City construction of the pump station at Clarendon and Laguna Honda Blvd. was just recently completed. The DEIR's definition of 'major' is omitted from the discussion. The DEIR presumably justifies its lack of discussion on the cumulative impacts of these projects, based on this definition. The cumulative impacts including the duration of active construction in the neighborhood, in addition to the intensity of construction, should be addressed. The DEIR also references the signal installation on Woodside Avenue and coordination with YGC. The traffic impacts to the neighborhood are not addressed in the report. 34 Specifically, the projected impact of traffic flow patterns due to the new traffic signal.

21 p. 3.1-12 "Potential Conflicts" G2. Institutional Master Plan. There is no mention of improvements to site access in the project description and how access relates to the master plan. The need for improved access relative to the master plan should be described and how the project will implement improvements, such as ADA access, and how those improvements affect the wall along Woodside Avenue should be included in the discussion.

40 p. 3.2-1/2/3/4: "Transportation, Circulation, and Parking. Summary" The project would result in an unmet parking demand..., which could be partially accommodated on-site and on adjacent major arterials." The DEIR needs to specifically identify which streets it is identifying as parking. If it is Woodside, the DEIR must address the fact that the YGC has already taken these places for its 3 to 4 year construction project. The overlap in the two project's construction schedule must

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50 be discussed as part of cumulative impacts. "During the peak construction period, the project sponsor and contractor may need to make arrangements at remote parking facilities to provide shuttle service…for both construction workers and hospital employees." Where do they intend to stage this? How are workers and equipment going to be shuttled to and from the project site? Is this a realistic option and has it been implemented successfully at other construction sites in the City?

49

p. 3.2-2: "C1. Regional Access" Monterey Blvd in mentioned as the north and southbound exits from I-280. There is no northbound exit labeled Monterey Blvd. This error needs to be corrected. If the text is referring to San Jose Ave. then the ability of construction traffic to negotiate the turns necessary to travel towards the project site must be addressed. In addition, the text mentions that trucks can turn left of Lincoln Way from 7th. This is not true. Alternative paths must therefore be identified and the impacts discussed.

23

p. 3.2-3: "Laguna Honda Blvd….from Clarendon to Dewey Blvd has unmetered parking on BOTH sides." There is no parking permitted on one side of LH Blvd. The DEIR needs to correct clarify this statement.

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p. 3.2-4: "Woodside Avenue.. has four-hour unmetered parking on both sides of the street." This overstates the number of spaces as not all reaches of the street are available for parking. It also fails to incorporate YGC's plan for the use of these spaces during its construction project.

25

p. 3.2-5: "Table 3.2-1" Note #5 briefly describes Woodside entrance improvements. These improvements need to be described in the DEIR in detail and the impacts (or improvements) to traffic flow to and from the institutions and within the neighboring residential streets discussed.

27

p. 3.2-11: "C4(b) On Street Parking" cites Pacheco Street from Castaneda to Alton Avenues as a source of on-street parking. This is an unrealistic alternative due to topography. The assumptions in the DEIR need to be explained. In addition the parking analysis excludes Idora and Ulloa Avenues even though a new signal and cross walk are planned at the intersection of Idora and Ulloa. These improvements would facilitate access to the project site and encourage day parking on Idora and Ulloa as well as portions of Portola. The analysis needs to be revised to include these streets.

33

p. 3.2-13: "C8. Planned Improvements.." describes the Woodside Avenue entry/exit. The description of existing conditions is inaccurate. It states drivers exiting are limited to right hand turns. They are currently not allowed to exit this location. The text states that this new entrance would be come a 'major ingress and egress

34

roadway for the hospital'. The impacts of this new exit/entrance on traffic within the neighboring residential streets are not discussed. 34

p. 3.2-19: "Parking Impacts" refers to "increased parking on arterials". Where is this parking available (i.e. where is parking under utilized?)? How does the residential permit program protect the neighborhood from parking impacts? What is the specific criteria used to determine that there will be no significant impact to neighbors considering both the duration of the construction project and the magnitude of the unmet parking need? Why if the DEIR reaches the conclusion of no impact does it earlier reference the need for remote parking? Why specifically, is the project unable to accommodate all project and operational parking on site through use of permanent and temporary parking areas? 40

p. 3.2-25: "Assuming that a portion of the construction workers car-pooled and used transit…..". This assumption seems highly unrealistic. Are there other projects where workers car-pooled and used public transit at the levels assumed in the DEIR? 49

P 3.4-21 D(2) Off-site Construction Traffic Noise - This section states "Although cut and fills would be balanced on site, trucks would need to haul building materials to the campus. The text does not address the potential need for trucks to cycle off-site due to limitations of internal site access roads. The DEIR should therefore stipulate a project requirement that all grading and other operations involving the cycling of trucks, will limit truck and vehicles movements to on-site routes. No off-site cycling of trucks or vehicles will be allowed. 62

p. 4.0 Mitigation Measures – General comment, this section should outline the necessary prohibitions on parking, traffic routes, on-site cycling of construction vehicles, etc. The section should also specify how these measures will be enforced, what provisions will be included in the project specification, what measure require completion of separate plans and documents, who will approve those plans and documents, and the timing of that approval relative to issuance of building permits and contractor notices to proceed. 73

p. 4.0-1: "A. Visual Quality" Mitigation measure #1 (Site Landscaping) refers only views from Twin Peaks Park. This would appear inadequate if the project includes improvements to access along Woodside and Laguna Honda Blvd. 75

p. 4.0-2,3 "B. Construction Noise" the text states "During all construction phases, there shall be close coordination between construction staff and hospital staff. THERE IS NO MENTION ABOUT THE RESIDENCES. A mitigation should include specific measures to address noise impacts to the community (Dellbrook and others) in the form of regular meetings, contact persons with the City and Contractor staff. etc. 79

85 p. 6.0: "Alternatives to the Project". All alternatives (p.6.0-13, 6.0-16) address visual quality of new hospital from Twin Peaks Park and Edgehill Way only, not from Woodside Avenue and Laguna Honda Blvd..

86 Alternative access routes from Laguna Honda Blvd. identified in St. John's scoping letter of July 2000, were not addressed in either the initial study or the DEIR. These alternatives should be discussed and the basis for their elimination identified.

Thank you for the opportunity to submit our comments. Please do not hesitate to contact Mr. Steve Suacci or me if you need additional information. I can be reached at (415) 566-2825. Mr. Suacci can be reached at (415) 759-6236.

Sincerely,

Eileen Fanelli

Eileen Fanelli
St. John's/St. Brendan's Local Organizing Committee

Cc: Michael Lane, Laguna Honda Hospital Replacement Project Manager
Mayor Willie L. Brown, Jr.
Tony Hall, Supervisor

Yvonne Howard
106 Cresta Vista Drive
San Francisco, CA 94127
January 10, 2002

Paul Maltzer
Environmental Review Officer
San Francisco Planning Dept.
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer:

I am writing on behalf of my parents, who live at 32 Dellbrook in Midtown Terrace. I am very concerned about the construction noise during the upcoming renovation of Laguna Honda Hospital. My parents are retired and are at home all day every day. They sleep until 9 or 10 a.m. and spend a lot of time in their garden. I am concerned that they will spend their final days being awakened every morning at 7 a.m. by the noise of the construction and that their home and garden will no longer be a tranquil space for them.

I attended a meeting of the LHH Replacement Project Team last night at Laguna Honda Hospital and was told that the construction noise would have "NO impact outside of the area of the hospital." This does not seem possible to me and I am concerned that the residents might have just been told what they wanted to hear. I want to be certain that the construction noise will not awaken my parents or disturb them during the day, as the duration of this project, 12 years, is a very long time to live under these circumstances. I would like some assurance about this before the project begins, rather than problems after.

I have spoken to some experts in this regard and have been told that some of the noise could be alleviated by installing insulation in the rear of the house and double pane windows and suggest that you consider doing this for those residents on the perimeter of LHH. I would also ask that you delay doing anything that could be noisy until 9 a.m. rather than 7 a.m.

My second concern involves my parent's view. They purchased this home because of it's view to the woods and country-like setting in the garden, where you currently see nothing except trees. I understand that three, seven story buildings

54 are going to be constructed in front of their view. If these are visible from their home, it would be very bad. I am wondering if this will be the case or if perhaps because of the different elevations of the land of LHH, these buildings will not be visible from my parent's home?

91 Please make this letter a matter of record, so that my concerns are addressed by the Planning Commission. Also please respond to me in writing on these two issues. My address is at the top of this letter.

Thanking you in advance for your help.

Yvonne Howard

LANDMARKS PRESERVATION ADVISORY BOARD

1660 MISSION STREET, 5TH FLOOR, SAN FRANCISCO, CA 94103-2414
TEL. (415) 558-6345 • FAX. (415) 558-6409

January 14, 2002

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Re: Laguna Honda Hospital Replacement Project

Dear Mr. Maltzer:

92 On December 19, 2001, the Landmarks Preservation Advisory Board (Landmarks Board) held a public hearing to consider and comment on the Draft Environmental Impact Report (DEIR) for the Laguna Honda Hospital Replacement Project. Project sponsors and architects made an excellent and informative presentation on the proposed project, and public testimony was taken. The Landmarks Board then discussed the DEIR in detail, and arrived at the following comments, which it hereby submits for your consideration:

65 1. 3.5 Historic Architectural Resources – The Landmarks Board concurs that the Laguna Honda complex is eligible for the National Register of Historic Places as an historic district under Criterion A, and that the Main Hospital Building and Clarendon Hall are individually eligible for listing under Criterion C.

4 2. 2.0 Project Description – The Landmarks Board supports the Project Objectives enumerated in the DEIR, including the Proposed Demolition Plan outlined on page 2.0-9. The Landmarks Board feels that, although the identified historic resources are extremely significant and worthy of protection, the more compelling need to sustain the viability of Laguna Honda in its social mission justifies their demolition.

81 3. 4.0 Mitigation Measures – The Landmarks Board generally concurs with the mitigation measures proposed for the loss of historic resources. However, the Landmarks Board believes the following should also be included as further mitigation:

- Further research should be done regarding the social history of the people housed and employed over the years in those buildings proposed for demolition. The social history of Laguna Honda is not

81

- adequately documented in the DEIR, nor in the Laguna Honda Hospital Historic Background Report, dated October 2001, which concentrate only on architectural and institutional history. Historic Photographs showing the social use of the spaces should be included both in the HABS documentation and the on-site interpretive display.

82

4. Landscaping – The Landmarks Board believes that the elements of the existing landscaping throughout the site are important resources and should be protected to the extent possible. The Landmarks Board also urges that the project include spaces in which future residents may themselves engage in gardening.

81

In conclusion, the Landmarks Board views the proposed loss of important historic resources as extremely significant. However, the Landmarks Board concurs with the necessity for their demolition, and urges the adoption of the additional mitigation measures proposed above.

Sincerely,

Tim Kelley, President
Landmarks Preservation Advisory Board

TK/ag

N:\lapb\LagunaHondaHospitalDEIRLPABcommentltr.doc

FAX 558-5991

SPEAK
1329 7th Ave
San Francisco, CA 94122-2507

January 16, 2001

Paul Maltzer, Environmental Review Officer
Planning Department
1660 Mission Street, Suite 500 FAX 558-5991
San Francisco CA 94103-2414

Re: Laguna Honda Hospital Replacement File No. 20010022015

Dear Mr. Maltzer,

Mary Anne Miller and I have the following suggestions for and concerns about the draft Environmental Impact Report:

15 **Gardening and the Natural Setting**--Laguna Honda Hospital sits in a lovely gardened area with many sites of both planted and natural vegetation. These areas should be preserved as much as possible. The EIR should provide a plan of the existing garden areas on the site, along with comments on how these sites will be protected during construction phases. This analysis is especially important for the on-site natural areas, which to some uninformed persons may look like 'a bunch of weeds,' but which in reality are important fragments of our natural world in San Francisco. Both a botanist to identify native plants and a geologist to document any significant rocky outcrops should be consulted for this study. In accordance with the Sustainability Plan of the City and County of San Francisco, future landscaping plans should emphasize plants native to the site.

42 **Parking**--- We are concerned about the Transit First Policy of the City and the problems of our ever increasing traffic. We note that Laguna Honda Hospital is situated in an area very well serviced by Muni and Muni Metro, with its efficient links to Bay Area wide transportation systems. From our informal survey, roughly 35% of the existing parking spaces are not used, even at times of seemingly maximal use. We are concerned that the Hospital's future plans do not adequately 28 encourage the use of our public transportation. 1) We ask that the public transportation service to the site be included in a figure in the EIR. 2) We ask that the EIR analyze the parking needs of the Hospital more thoroughly, giving not only the total employment and total parking spaces on the site, 41 but also the number of employees during each shift and the number of unused parking spaces during a typical week. 3) In keeping with the Transit First Policy, we ask that Laguna Honda Hospital's Plan offer mitigation for its effects on City traffic and congestion by reducing the number 74 of planned parking spaces to the Planning Code's general recommendation for this sort of facility, 294 spaces.

53 **Lighting**--We commend the EIR for sharing our concern about incidental light. The EIR should mention that Laguna Honda Hospital site is geographically midway between two major natural areas, the Mt Sutro Open Space Preserve and Mt Davidson Park. In its current condition, with large areas having minimal exterior lighting, the grounds of the Hospital serve as part of the flyway for some of the few remaining owl populations in San Francisco. The ravens, on the other hand are increasing in the City. Ravens out-compete owls in areas with night light. We ask that not only should the new construction be sensitive to incidental light, but also that the EIR pledge to keep as 76 much of the grounds in darkness as possible for foraging owls. (It may be advisable to consult a ornithologist; we, however, are not insisting on this.)

63 **Noise**---As is well documented in the draft EIR, Laguna Honda Hospital is surrounded on two sides by residential neighborhoods. Noise is a pollutant of every city. While the EIR discusses construction noise, it does not fully discuss building noise. The EIR should include an analysis of the existing noise sources on the site, with a commitment not to increase noise levels and if possible to decrease noise in the future buildings. This is especially important since the newly constructed buildings will no doubt have 'climate control.'

64 **Deconstruction**---The Sustainability Plan of the City and County of San Francisco promotes the use of deconstruction rather than demolition. We ask that the EIR include plans for deconstruction of all the buildings proposed for demolition.

Sincerely,

Pinky Kushner

Pinky Kushner
415 731-9486

Richard V. Lambert Jr.

461 Dellbrook Avenue
San Francisco, CA 94131

Phone (415) 661-4423 • Fax (413) 332-5541
RVLambert@msn.com

December 11, 2001

San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

ATT: Paul Maltzer, Environmental Review Officer

RE: Laguna Honda Replacement Project
Easier access to Forest Hill Muni Station for residents of Midtown Terrace

Dear Sir:

The distance and slope from most residents in the western side of Midtown Terrace makes a walk to the Forest Hill Muni station a difficult undertaking. From my resident approximately 20 minutes are required to walk to the station, with a much more difficult walk back uphill of 30-35 minutes.

A easier walking/bath path providing access through the newly designed Laguna Honda Hospital from the south end of Dellbrook Avenue (around 100 Dellbrook) or from the St. John's Armenian Church would provide a public service for all the residents of the western area of Midtown Terrace. It would also serve to open up the newly designed Laguna Honda Hospital to the whole community, rather than remain a secluded city geriatric hospital. The walkway could be incorporated within a park like setting that would serve to life the spirits of the residents of the hospital as well as the community around it. It would also serve the utilitarian need of giving easier access to Muni.

It would also serve to open up the valley that separates the hospital and the neighborhood, which at times appears to harbor camp like conditions for some less fortunate.

I am not sure if the above idea has been introduced, or it workable as I have not made a detailed study of the space. Would you be able to offer me your comments? I would like these ideas to be aired at the upcoming public hearing with an appropriate response.

Thank you.

Best Regards,
Dick Lambert Jr
Dick Lambert Jr.

San Francisco Public Transportation Department

949 Presidio Avenue, San Francisco, CA 94115 415.673.6864

MEMORANDUM

To: Paul Maltzer, Major Environmental Analysis

Through: Peter Straus, Mgr. of Service Planning

From: James D. Lowé, Transit Planner

Subject: Laguna Honda Hospital; 2000.005E

Date: 11 December '01

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31 The San Francisco Municipal Railway Service Planning staff have no further comments in response to your request for review of the Draft environmental Impact Report for the Laguna Honda Hospital Replacement Project. However, our previous comments remain applicable. See attached.

32 I should note that any change to or construction impacts on Line 89-Laguna Honda should be coordinated through our Street Operations/Special Events office at 554-9286.

attachment

cc: L Mancini, Chief Operating Officer
JDL, SP Chron

JDL:A9:LagunaHonda3.cir.

San Francisco Public Transportation Department

949 Presidio Avenue, San Francisco, CA 94115 415.673.6864

MEMORANDUM

To: Hillary Gitelman, Major Environmental Analysis

Through: Peter Straus, Mgr. of Service Planning

From: James D. Lowé, Transit Planner

Subject: Laguna Honda Hospital; 2000.005E

Date: 26 June '00

The San Francisco Municipal Railway Service Planning staff have the following comments in response to your request for review of the Transportation Study for the rehabilitation of Laguna Honda Hospital.

In general, it is difficult to discern from the report whether the facility will remain open to clients during this major rehabilitation effort and to what level. Perhaps a section needs to be developed that details the phasing of the project and what parts of the facility would remain open during construction.

As you may know, Muni operates a shuttle service Line 89-Laguna Honda that runs around the hospital grounds and offers service to Forest Hill Station and Laguna Honda Blvd. (See attached map.) Muni staff would need to meet with project sponsors to discuss interim changes and whether or not permanent changes to the route are needed.

Route 89 should be discussed in Section 4.1.2. In addition, it is incorrectly shown in Figure 2.2, which implies that operation is not affected by changes to the Laguna Honda facilities.

attachment

cc: W Streeter, Deputy GM
PS, JDL, SP Chron

A9:JDL:LagunaHonda.eir.

Department of Toxic Substances Control

Edwin F. Lowry, Director
1001 "I" Street, 25th Floor
P.O. Box 806
Sacramento, California 95812-0806

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

December 6, 2001

Lisa Gibson
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, California 94103

Re: Laguna Honda Hospital Replacement

The Department of Toxic Substances Control (DTSC) is in receipt of the environmental document identified above. Based on a preliminary review of this document, we have determined that additional review by our regional office will be required to fully assess any potential hazardous waste related impacts from the proposed project. The regional office and contact person listed below will be responsible for the review of this document in DTSC's role as a Responsible Agency under the California Environmental Quality Act (CEQA) and for providing any necessary comments to your office:

69

Barbara Cook
Site Mitigation Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710

If you have any questions concerning DTSC's involvement in the review of this environmental document, please contact the regional office contact person identified above.

Sincerely,

Guenther W. Moskat, Chief
Planning and Environmental Analysis Section

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

Printed on Recycled Paper

Anne and Timothy Poirier
139 Olympia Way
San Francisco, CA 94131
(415) 826-6639

December 11, 2001

Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

RE: Draft EIR for the Laguna Honda Hospital Replacement Project (Planning Department Case No. 2000.005E)

Dear Mr. Maltzer:

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the Laguna Honda Hospital Replacement Project. We live in the Midtown Terrace neighborhood to the east of the proposed project. The following are our concerns:

1. We object to the proposed Zoning Map Amendment and General Plan Amendment given the character of the surrounding neighborhoods. Increased height, bulk and density would greatly detract from neighborhood views and contribute to an industrial look in a residential neighborhood of predominantly two-story single-family homes and green belts. Seven-story tower blocks must be distributed to no more than current four-story structures.

2. We believe the historic architectural significance of the current buildings should be considered and preserved. Redevelopment and seismic upgrades should be within current historic building structures.

3. The 50% open space zoning of the total 62-acre land parcel will be ignored during the multi-year redevelopment period. This is public property and citizens must maintain the right to access of 50% of the land. It is unclear whether the final project will spread outside the 50% public-access zoning area as well, which does not include private parks for Laguna Honda use only.

4. The forests abutting Panorama, Dellbrook, Olympia and Clarendon must be attended to immediately. Additional trees must be planted before the project begins to provide ample time for the growth of these natural view and sound barriers.

5. The construction staging and parking area—with attendant generator, work and traffic noise—within feet of the backyards of the 000-100 block of Dellbrook must be moved to a less intrusive area.

9 6. An alternate plan for the placement of the large satellite complex by the water tanks behind the 100 block of Dellbrook should be considered. Midtown Terrace has the highest concentration of antennas in the city, and this site would increase this negative visibility and necessitate a thinning of the forest buffer.

83 7. Building demolition and removal of asbestos and other hazardous materials should not be done on days with more than 5-mph winds. Flyers should be distributed to homes within 1000 feet with a tentative schedule for these activities so that windows may be closed to reduce intrusion of dust.

58 8. Noise levels are unacceptable for Midtown Terrace neighbors.

60/98 9. Hours of operation for demolition and exterior construction should be limited to Monday to Friday from 8 AM to 5 PM to decrease the proposed intolerable noise levels to a reasonable timeframe.

67 10. The abandoned garbage dump to the north—including broken glass, rusted metals, and medical waste—must be evaluated and cleaned up. This is a dangerous area for the public, yet a public trail passes right through the middle of it. Remediation of soil and water quality might be necessary.

67 11. The rubble dump behind the 000 block of Dellbrook should be restored to meadow for public use as quickly as possible.

95 12. Homeless encampments must be kept under scrutiny on the entire land parcel.

Thank you for addressing these significant environmental impacts.

Sincerely yours,

APoirier

Anne Poirier

Timothy Poirier

1-14-02

466 Frederick #4
94117
387-5435

Dear Mr. Maltzer:

96 I am writing to express my opposition to the proposed increase in parking spaces at Laguna Honda Hospital. I don't want my tax dollars going towards more cars, more congestion, and more pollution in nearby neighborhoods.

46 Also, the Hospital driveway feeds directly onto one of the city's major bike routes, on 7th Avenue. When I taught at San Francisco State University, I used this bike path on my daily commute. That stretch in front of Laguna Honda was by far the most dangerous part of my commute. Every time I biked down that hill in front of the Hospital, I was scared I was going to be killed. Part of the problem was how little regard most drivers had for the posted speed limits, but the other part came from cars entering and exiting the hospital driveway. An increase in motor vehicle traffic at that intersection would turn an already extremely hazardous situation into one that is potentially deadly for bicyclists and pedestrians.

97 The existing parking lot at Laguna Honda is underutilized. There is a MUNI station across the street, served by numerous lines. Instead of increasing parking, you should be using public money to improve public transit to and from the hospital. This is something that will actually benefit the majority of San Franciscans, instead of adding more cars to an already car-choked city, for the benefit of a few private car-owners.

Sincerely,

Katherine Roberts
Board Member,
Haight Ashbury Neighborhood Council

* Attn Paul Maltzer 558.5991
or Edgar 558.6082

CAPITAL PARTNERSHIPS INC

560 Dewey Boulevard
San Francisco, California 94116-1427
Telephone: 415-759-9150
PCS Phone: 415-377-0274
Facsimile: 415-759-0977
E-mail: cpidave@attglobal.net

Davis R. Schwartz
Senior Principal

January 10, 2002

Mr. Paul Maltzer
Environmental Review Officer
Laguna Honda Replacement Program
375 Laguna Honda Boulevard
San Francisco, California 94114

Dear Mr. Maltzer:

I am Treasurer of the Board of Directors of the Dewey Circle Beautification Project (DCBP), a non-profit group that has been involved in addressing traffic issues on both ends of Dewey Boulevard – the traffic signalization improvements on the north end as well as development and maintenance of the traffic circle on the south end – for more than eight years.

Last night, I attended an informational presentation on the Draft Environmental Impact Report on the Laguna Honda Replacement Program. On behalf of the DCBP Board of Governors, I am writing to register both some positive and negative comments on the proposed project:

98 1. We are very pleased with the proposed ingress and egress road off Woodside Avenue to be shared by the Hospital and the Youth Guidance Center. As a signalized intersection, the proposed road should reduce traffic backups on both Woodside Avenue as well as Seventh Avenue caused by the current egress of all traffic at the Hospital's main driveway.

45 2. We continue to be concerned for pedestrian safety at the north end of Dewey Boulevard. We would like the Hospital (and/or the City) to further explore (a) rehabilitating the pedestrian tunnel from the Forest Hill Muni station to the other side of Laguna Honda Boulevard or (b) building a pedestrian bridge in the vicinity.

47 3. We are very opposed to the idea of construction trucks hauling materials on Dewey Boulevard for two reasons. One, there are potential safety problems at Dewey Circle, where there is already considerable traffic associated with the drop-off and pick-up of children at West Portal Elementary School; loaded construction trucks don't exactly stop on a dime even when there is a crossing guard. Two, Dewey Boulevard was not constructed for heavy truck traffic. We are already experiencing (a) cracking in the roadway and (b) subsidence of our sidewalks and boulevards due to the inappropriate use of Dewey Boulevard by Muni buses and Safeway trucks. We are trying to get such heavy vehicles off Dewey Boulevard; we are not looking for heavy construction trucks to exacerbate the existing problems.

If you need more information, please contact me at (415) 759-9150.

Sincerely,

SIERRA CLUB
SAN FRANCISCO GROUP

85 Second Street, Box SFG, San Francisco, CA 94105

December 21, 2001

Paul Maltzer, Environmental Review Officer
Planning Department
1660 Mission Street, Suite 500 FAX 558-5991
San Francisco CA 94103-2414

Re: Laguna Honda - 2000.005E

Dear Mr. Maltzer,

The Sierra Club has the following responses to the transportation section of the subject Environmental Impact Report:

1 The study gives the total employment on site but it should list the number of employees on site during each shift along with information on the hospital's staggered arrival policy which can determine the use of transit and parking.

3 On Page 3.2-15 Paragraph D1(c) Parking states in part: " Policies in the San Francisco General Plan emphasize the importance of public transit use and discourage the provision of facilities that encourage automobile use." The EIR also includes a paragraph explaining how a "shortfall" in parking supply will have only minor environmental impacts. However the transportation analysis proceeds assuming that nearly all "necessary" free parking will be provided after a survey that shows that almost all of the existing parking was occupied. The EIR should have included an alternative of only providing the employee and visitor parking required by the planning code - 294 spaces rather then the 655 spaces proposed. This should not require any change to the provisions for off-street loading.

14 This analysis should include some system similar to parking cash out which is mandated by state law for all employers of more 50 people, who pay for parking which they then provide at no cost to employees. They are required to offer employees cash instead of free parking and studies show that this has resulted in increased car pooling and transit use. Parking cash out applies to new construction which would construct employee parking. The proposed parking lots have the obvious costs of construction, maintenance and lighting. There are also hidden costs for the land which would have been better used as open space which could provide health benefits for the residents and neighbors.

We suggest a parking system which: a) Provides some parking for visitors, and occasional parking by employees, within the total provided, with hourly parking fees similar to other hospitals in the City; b) Provides a few spaces with lower parking fees for volunteers; c) Sells

monthly parking permits for employees at the market rate, similar to the proposal that the Planning Department is discussing for residential areas where the parking supply is limited; and d) Distributes of all of the revenue collected from b) and c) plus the reduction in the obvious costs of parking to the City, to all employees (based on shift worked) who do not obtain a parking permit.

To illustrate how our suggestion could work we estimate the following: 1) Total monthly income from 294 parking spaces based on approximately $100 for each monthly day shift employee parking permit = $ 29,400 a month per c) above; 2) Assume that 1) includes all other revenue per a) and b); 3) Add $1.00 a day savings (based on BART's maintenance expense for surface parking lots) for the 361 spaces not provided = $10,800 a month; 4) This totals $40,200 a month; 5) Assume that this amount will be divided between 400 day shift employees (the EIR did not include sufficient information to determine this number) who don't obtain a permit = $100 per employee per month. This is much more than the cost of a Fast Pass (which many employers provide their employees) and ample to induce many employees to car share and help their driver pay for parking. The monthly distributed share plus an employee's reduced automobile expenses will encourage transit use or car pooling even when an employee has to occasionally pay for parking per a) above. The market rate for swing shift will be much lower and the rate for graveyard may be zero.

44

The study and implementation of our proposed alternative is required by the Transportation Element of the General Code as listed on page 3.1-7. Policy 33.1 limits the provision of parking and 33.2 protects residential neighborhoods from parking impacts which is already provided for with the existing Residential Parking Permit system. In addition The Planning Department is beginning to reduce the required supply of parking for residential units and people will drive less. The EIR correctly shows that the hospital is well served by transit, within one block, and there is capacity for a few more riders per transit vehicle while a reduction in auto use will reduce the queuing which delays buses.

Very truly yours,

Howard Strassner

Howard Strassner, Chair Transportation Committee
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PS: Please send the signer a copy of the Final EIR

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January 10, 2002

Mr. Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

RE: Draft Environmental Impact Report for Laguna Honda Hospital Replacement

Dear Mr. Maltzer,

This letter is in response to the EIR that was published on December 1, 2001 for the Laguna Honda Hospital Replacement. Specifically, I would like to comment on the satellite dish complex and the existing medical waste dump which is currently located on the Laguna Honda property (assessor's block 2842, Lot #7).

The Satellite Dish Complex:

9 The draft EIR is misleading the public as to the true nature and function of the satellite dish complex. The satellite dish complex is owned by AT&T. AT&T has a contractual arrangement with the City of San Francisco to have their satellite dishes placed on Laguna Honda property. In essence, AT&T is a tenant and San Francisco/Laguna Honda Hospital is the landlord. On page 2.0-9, section E2 of the draft EIR states the following:

"Proposed new construction would include hospital buildings and associated support facilities, an assisted living facility, and parking lots. The new hospital buildings would consist of the Greenhouse Building, Clarendon Hill West, Clarendon Hill East, and the Link Building. The associated support facilities would include a boiler and power plant, an underground fuel storage tank, a fueling station, a satellite dish, and loading docks."

The EIR is telling the public that the satellite dish complex is a necessary support facility for Laguna Honda Hospital. In the language of the EIR the satellite dish complex is as vital to the operation of Laguna Honda Hospital as power plants, boilers and loading docks. In truth, the satellite complex does not provide any operating support to the functioning of Laguna Honda Hospital. The current three (3) satellite dishes at Laguna Honda Hospital are "Television Receive Only" (TVRD) satellite dishes. TVRD satellite dishes only receive signals; they do not broadcast signals. I would like the EIR to 1) reflect the true nature of the relationship between AT&T and Laguna Honda Hospital and 2) state that the satellite dish complex is separate and unique from the operation of Laguna Honda Hospital.

Although the draft EIR does mention the current three TVRD satellite dishes, it does not describe what equipment will be placed at the new location. The EIR should state specifically 1) what communication equipment will be placed at the new site, 2) the dimensions of any new or old antennas or satellite dishes and 3) what, if any, new communication equipment might or could be added under the current terms of the agreement between AT&T and the city of San Francisco.

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Section 3.3 of the EIR titled "Visual Quality" focuses on visual changes in the context of alteration or obstruction of scenic views from public areas, tree removal, and the introduction and change of light sources. The EIR examines the impact of the proposed hospital design and goes to great lengths to show that the new design will have a small or limited impact on local viewpoints. The EIR does not study, examine or mention the impact of placing three forty-foot high satellite dishes on the top of a ridge overlooking a neighborhood. These three satellite dishes will have a great impact on "visual quality" as they loom over the Midtown Terrace neighborhood. I would like the EIR to examine the "visual quality and sight lines" of the planned relocation site for the satellite dish complex. This study should be conducted before the site is relocated.

Laguna Honda Hospitals "open space" should not be decreased for a non-essential facility such as the satellite dish complex. As can be seen on figure 2.0-4, the proposed site plan, the satellite dish complex will compromise approximately 3 - 4% of the projects existing open space. The reduction of Laguna Honda open space would be unnecessary if the project would simply relocate the satellite dish complex to a new location either on or off of the Laguna Honda Hospital site.

The EIR should state the impact of the satellite dish complex as it relates to open space and explain why the public should sacrifice so much open space for a non-essential facility.

9 The current location of the satellite dish complex is approximately 300+ feet from Dellbrook Avenue homes. The proposed relocation site is no more than 80 feet from the nearest Dellbrook Avenue Home. The ridge below the proposed new site location is extremely steep and may be weakened by the construction and weight of the satellite dish complex. Over the last five years, the soil above the Youth Guidance Center has been shifting and moving. Homes on Panorama Street are beginning to suffer from cracks caused by these soil shifts. A study examining the strength of the Dellbrook hillside should be conducted. If the hillside is found to be impacted by the satellite dish complex, the complex should either be relocated to another site and/or the Dellbrook hillside must be reinforced.

The Laguna Honda Hospital medical waste dump

67 There is an existing medical waste dump on the Laguna Honda site that has not been mentioned in the draft EIR. The dumpsite appears to be old and is partially covered with blackberry vines. A site inspection will show large fields of glass bottles, medicine bottles, bedpans and a tremendous assortment of related hospital waste. The dump is extensive and appears in some places to be very deep. The dump is spread out from the top of the hill that borders the Clarendon Hills West, the Clarendon Hills East building and continues along the Clarendon West parking lot (see diagram). The dump continues down into the valley located between Clarendon Avenue and Clarendon Hill and goes into a dry riverbed.

The draft EIR is incorrect when it states on page 3.6-8 "Furthermore, there are no past, present, or reasonably foreseeable future projects in the project vicinity that are anticipated to result in impacts associated with hazardous building materials or soil and groundwater contamination that could affect the project site." The existing medical waste dump adjacent to the project could easily have a cumulative impact on hazardous building materials, soil and groundwater contamination. The EIR must consider the environmental hazards represented by the old medical waste dump.

The medical waste dump must be subject to the same mitigation rules that govern the entire Laguna Honda site for the following reasons:

1. Although boundary modifications between the 80-D and open spaces districts have not been determined, I believe that at least part of the old medical dump will fall inside the project boundaries.

2. Some of the aggregate from demolished buildings will probably come into contact with the medical dumpsite.

3. As the EIR states in section 3.6-7-E4, "There is also a possibility of encountering contamination in areas not previously suspected to be contaminated. Disturbance of contaminated areas could expose construction workers, employees, residents, or visitors to these substances, which could result in adverse health effects if exposure were of sufficient quantities."

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4. Good sense dictates that public "open spaces" should not be left in a contaminated state. What good is "open space" that the public cannot visit or use safely?

Thank you in advance for your consideration regarding the satellite dish complex and the medical waste dump. Should you have any questions or need further information, please don't hesitate to contact me. I look forward to a well-managed and safe demolition and reconstruction of Laguna Honda Hospital.

Sincerely.

G. S. Wooding

George Wooding
11 Dellbrook Avenue

FOREST HILL ASSOCIATION
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San Francisco, CA 94116
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January 11, 2002

Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

The Forest Hill Association, a residential homeowners association of some 670 single family residences adjacent to Laguna Honda Hospital at its western border, submits the following comments on the Draft EIR for the Laguna Honda Hospital Replacement Project (2000.005E).

17 As an adjacent residential district, the Forest Hill Association is essentially concerned with the external environmental and traffic effects of the Replacement Project, both during the prolonged anticipated demolition and construction and upon completion.

17 1. **Section 3.2 Transportation Circulation, and Parking**
The EIR should more thoroughly examine the traffic and parking impacts which will occur at different stages during the planned eight years of construction.

56 2. **Section 3.3 Visual Quality**
The precise extent of tree removal should be determined and mitigation in the form of replacement planting should be considered. A site survey plan should indicate all trees to be removed and all trees to be preserved. Without such a plan the analysis of the tree removal provided in the Draft EIR is meaningless.

Respectfully submitted,

Harold A. Wright
Director, Forest Hill Association

CITY PLANNING COMMISSION
CITY AND COUNTY OF SAN FRANCISCO

LAGUNA HONDA HOSPITAL REPLACEMENT, Public Hearing on Draft Environmental Impact Report) No. 2000.005E

Thursday, January 10, 2002
3:48 P.M.
Commission Chambers
Room 400
City Hall
San Francisco, California

REPORTED BY: ALENE D. WEIR
CSR #7587

CITY PLANNING COMMISSIONERS PRESENT

Anita Theoharis, President
William W. Fay, Vice President
Roslyn Baltimore
Hector Chinchilla
Cynthia Joe
Myrna Lim
Jim Salinas, Sr.

ALSO PRESENT

Gerald G. Green, Director of Planning

--oOo--

JANUARY 10, 2002 3:48 P.M.

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SECRETARY AVERY: The Planning Commission is back in session.

Commissioners -- as soon as I find my calendar -- we are now on Item No. 12, Case No. 2000.005E, 375 Laguna Honda Boulevard, Laguna Honda Hospital Replacement. This is a public hearing on the draft environmental impact report.

MS. GIBSON: Good afternoon, President Theoharis, Members of the Commission. I'm Lisa Gibson of the Planning Department staff.

The purpose of the hearing is to receive comments on the draft of the environmental impact report for the Laguna Honda Hospital Replacement Project, Case No. 2000.005E.

Staff is not here to answer comments today. Comments will be transcribed and responded to in writing in a Comments and Responses document which will respond to all verbal and written comments received and will make revisions~~provisions~~ to the draft environmental impact report as appropriate.

This is not a hearing to consider approval or disapproval of the project. That hearing will follow the final environmental impact report certification. Comments today should be directed to the adequacy and accuracy of information contained in the draft of the environmental impact report.

Commentors should speak slowly and clearly so that the court reporter can produce an accurate transcript. Also commentors should state their name and address so that they can be properly identified and so that they can receive a copy of the comments and responses document when it's completed.

After comments from the general public, we will also take any comments on the draft EIR by the Planning Commission. The public comment period for this project began on December 1st, 2001 and extends until 5:00 p.m. Wednesday, January 16th, 2002.

This concludes the presentation on this matter. And unless the Commission members have any questions, I would suggest that the public hearing be opened.

PRESIDENT THEOHARIS: Thank you.

If you hear your name, could you come and sit towards the front of the room.

John Balestreri. Where is Katie Balestreri?

Okay. Mr. Balestreri.

MR. BALESTRERI: Good afternoon,

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Commissioners. My name is John Balestreri. I live at 241 Montalvo, San Francisco, 94116. I'm the director of the board of directors of the Forest Hill Association, which represents 670 homeowners.

We sent you a letter and you were kind enough to include it in the draft. And most issues have been covered, except for the construction traffic. We are concerned that there will be construction traffic coming from Portola from the south, down Claremont and up to Dewey -- down two blocks to Dewey. There's also West Portal school at Dewey; and there are crosswalks and children there every day, five days a week.

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We understand that there will be some construction traffic coming through there during the Youth Guidance Center reconstruction. So that probably will give us 10 years of very dangerous traffic in our neighborhood. We have a problem with Safeway trucks coming through and buses that dead end at the end of the day, in the evening, and they're not supposed to come through. The street has become a very busy, dangerous street. And we're very concerned about that.

And I understand that the construction traffic hasn't been set yet, so we would like to know

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how to approach that problem, both coming from the north and from the south.

And once again, thank you for including our letter and most of our concerns have been answered. And I thank you for the time.

PRESIDENT THEOHARIS: Thank you.

Katie Balestreri. And then where is Nancy Rosellini? Not here?

Okay. Go ahead, please.

MS. BALESTRERI: Good afternoon, Commissioners. My name is Katie Balestreri, and I live at 241 Montalvo Avenue in San Francisco, which is just down the street from Laguna Honda Hospital at the corner of Dewey Boulevard and Montalvo, right on the Dewey Circle. I am also a board member of the Dewey Circle Beautification Project. That project was last year the recipient of an award from San Francisco Beautiful. Together with other board members, neighbors, and supporters we've worked hard to enhance the beauty in our neighborhood and the quality of life there.

It's my understanding that the current plan shows that construction vehicles will approach Laguna Honda Hospital and that project by turning off (sounds like) Brook Boulevard at Claremont Boulevard

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and then head up towards the Dewey Circle and towards the hospital. And as my husband alluded just prior, there is the West Portal Elementary School there and lots of foot traffic and a neighborhood field.

I'm concerned, and all of us are, about the heavy trucks that move through -- would be moving through this residential neighborhood. As an easy alternative I would like to propose that the trucks come from the southwest continuing on Portola Drive and then turning at Woodside to access Laguna Honda Hospital that way.

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If they are unable to make that sharp turn into Laguna Honda Hospital from that approach, I would recommend that instead they go down 19th Avenue, turn up Lincoln Boulevard, and then on 7th Avenue, and then they can easily make a left-hand turn into the hospital.

I would like to propose those alternatives for your review and in order to keep the residential neighborhood and quality of life in the West Portal/Forest Hills area. Thank you.

PRESIDENT THEOHARIS: Thank you.

Nancy, are you here? No? Okay.

Eileen Fanelli. Is Eileen here? Okay. And where is Ann Wharton? Ann, if you could come and

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sit more towards the front, I'd appreciate it.

MS. FANELLI: My name is Eileen Fanelli. I live at 51 Idora, and am a member of the St. John/St. Brendan's local organizing committee.

We sort of had a sequence here, and I was supposed to go last. So I'm going to try to phrase this and what you'll see is that --

PRESIDENT THEOHARIS: Well just one minute. I don't have to call these cards -- if you know who your speakers are.

MS. FANELLI: Yes, we do.

PRESIDENT THEOHARIS: Okay. Well why don't we start again. Just come on up, the speakers who were going to speak in a certain order and then I can just pull the cards. I don't want to deprive

anyone.

MS. FANELLI: We would appreciate that.

PRESIDENT THEOHARIS: Next time number them.

MS. FANELLI: We'll do that.

PRESIDENT THEOHARIS: Go ahead, sir, and I'll find your card.

MR. RIDGWAY: My name is Roger Ridgway. I'm the pastor at St. John's Unified Church of Christ. Our church is on the corner of Laguna Honda Boulevard

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and Woodside Avenue, right across from Laguna Honda Hospital.

St. John's, and St. Brendan's as well now, are part of the San Francisco organizing project. And we have, what Eileen just referred to, is our local organizing committee, members of these congregations and neighbors.

On March 24th, 1999 we had an action meeting where 200 members and neighbors sat with Mr. Anthony Wagner, Director of the Community Health Network; City Attorney Louise Renne; and Mayor Willie L. Brown, Jr.

And at that meeting they signed this covenant pledging their support for the items on this list. And there's two items that I want to highlight here, are Input and Access. You see they all signed it. They promised us that our neighborhood organization would have input during the planning process and construction. And they promised us that the new design would promote greater access of the patients to the outside world and the outside world to the Laguna Honda campus. More openness, less isolation, a more gracious integration of this large institution with our neighborhood.

I was appointed to the commission that

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developed the bond measure where the project was defined to include the areas appurtenant to or which provide access to such new facility or facilities.

Our local organizing committee~~community~~ worked enthusiastically in support of the $299 million bond measure. We do not oppose the project. I know that's not relevant here, but just to say that we have worked, through our member congregations, to pass the bond measure. And I claim some credit for the 73 percent majority.

Since the passage of the bond we have had numerous invitations to sessions at Laguna Honda Hospital and people who are taking the lead on the Laguna Honda replacement project have come to St. John's and met with our research group on numerous occasions. But there's still a question of how serious our input has been taken.

A letter written to Ms. Lisa Gibson of the Planning Department on July 2nd, 2000, in which we spelled out in some detail our concern about the initial study was not included in the draft EIR. And

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ment needs
ese added to Comment 90

another e-mail communication was also omitted. We've not been satisfied with plans which have been presented so far to open up access to the institution and to make sure that negative traffic impacts are

mitigated. Of course, those conversations are still going on.

We've taken the lead in putting together a $75,000 Transportation for Liveable Communities Planning grant proposal to the Metropolitan Transportation Commission. That's an expression of our willingness to contribute to a successful planning effort.

But we believe that the failure to include these issues of access and the trafficking in our neighborhood in this draft EIR is not only a betrayal of the promises we received from the city at this meeting, but also a flaw in the report which should be corrected simply on the basis of the norms of responsible planning.

Thank you.

PRESIDENT THEOHARIS: Thank you.

Next speaker.

MR. BURBANK: Thank you. My name is Gene~~Jim~~ Burbank. I live at 18 Idora, and I've been a resident of the area for 25 years, in San Francisco for over 50. And my concerns today are twofold, and they are more omissions than a problem with the environmental report per se.

The first has to do with traffic. The

areas of the report that deal with traffic tend to focus on parking, which is important to all of us in the triangle community between Woodside and Laguna Honda and the greater Forest Hill extension area.

But there is also a question of traffic changes, traffic pattern changes, that are going to be caused by the projected light and the increased traffic. The report talks about traffic not being materially changed because the parking spaces and the number of people and so forth. It omits the number of construction workers and the truck traffic that's moving back and forth.

The point I would like to make about the traffic changes is that this whole area has very small streets. It's family oriented. There are children and schools in the area. And the way it happens now, for example on Dewey Drive, when traffic begins to back up because of a light change or the volume of traffic, the cars move onto Merced and move through there at a very high rate of speed. We are afraid that lights changing in the Woodside area are also going to cause that same type of traffic to divert through the area. And that really hasn't been addressed in the environmental impact report.

The other thing that I would like to talk

about is the fact that the project is poorly

described. There are no details on the construction schedule, staging areas for construction equipment, what materials and what quantities will be used, how concrete will be brought to the site, how disabled access to and from the site will be provided, how work will be sequenced. This leaves the project element so wide open that it is difficult to assess the project impacts.

The project scope states it is one of the -- one of its elements is the beautification of the campus. Right now you have an institution that is surrounded by walls. In some cases very large walls on Woodside. To reflect the bond measure and the concerns of the public, the project scope should state as one of its elements integration of the institutional scale of the campus with a surrounding residential scale making the area more accessible to the community and to the residents of Laguna Honda moving off the campus site and onto the surrounding community.

5 The EIR never mentions integration of the project with the surrounding community. The EIR only mentions beautification when it addresses the view of Twin Peaks Park. It fails to mention integration and

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beautification as it relates to improved access. Specifically the EIR does not address the 16 -- six to 17 foot concrete graffiti wall along Woodside or the four-foot concrete wall along Laguna Honda, although these two features are physical and psychological barriers to the access to the hospital and to the main streets surrounding the hospital.

The failure to address site access as a primary method of integrating this project with the surrounding community is a glaring omission of the EIR, and this omission should be corrected.

PRESIDENT THEOHARIS: Thank you. What was your name again, sir?

MR. BURBANK: My name is Eugene Burbank.

PRESIDENT THEOHARIS: Thank you.

Next speaker.

MS. SAPIRO: Hello. My name is Cornelia Sapiro, and I have lived at 30 Balceta since 1976. I'm also a member of the St. John's and St. Brendan's local organizing committee.

My concerns are how the draft EIR does not effectively deal with traffic issues. Specifically the proposed traffic signal at a driveway which will serve both Laguna Honda and the Youth Guidance Center at the intersection of Idora and Woodside.

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The EIR does not describe the proposed signal, traffic lanes, street medians, and the impact on the neighborhood. It does not explain how the new light will alleviate severe traffic backups during peak periods at Laguna Honda Hospital. It does not explain how the signal will prevent backups onto Woodside nor on adjacent residential streets.

Traffic headed east on Woodside toward Portola already backs up. The proposed signals at Idora and the one on Hernandez will increase the backups and force still more cars to turn onto Balceta and Hernandez to gain access to Laguna Honda Boulevard and streets to the south. These streets are narrow and have many children living on them.

35 There is no description in the draft EIR of significant or meaningful deterrents to the use of these streets to gain access to Laguna Honda. There is also no clear explanation of how the new driveway and signal at Idora and Woodside will prevent cars that are exiting the driveway from crossing Woodside and using Idora to also cross over to Laguna Honda Boulevard.

Our concern is that the EIR must address these major traffic issues before the construction of the new signal and driveway on Woodside at Idora.

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Thank you very much.

PRESIDENT THEOHARIS: Thank you.

Next speaker.

MR. SUACCI: Good afternoon. My name is Steve Suacci, and I'm also a member of (unintelligible) and a longtime resident of the neighborhood. My address is 121 Balceta Avenue, 94127. I'm also past president of the Greater West Portal Neighborhood Association.

And the elements that I'd like to address today particularly involve the transportation, circulation, and parking elements of the EIR and the impact of the construction project on neighborhood parking.

Specifically the EIR states that unmet parking demand can be met partially on site and also in part on neighborhood arterials. Specifically Woodside Avenue, Laguna Honda Boulevard, and Clarendon Avenue.

40 Woodside Avenue right now has parking on portions of it, some of which is now going to be reserved by the Youth Guidance for their construction or once that project starts. So that arterial will become essentially useless. Other parts of it do not have any parking on it, specifically because they are

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traffic lanes. So it's really a misnomer to say there's available parking on the nearby arterial of Woodside.

On Laguna Honda Boulevard there is some parking down by the Forest Hill Christian Church, although parking on the north side of the street has been taken away. The city, after they completed the pump station for the reservoir, they put in a bicycle lane. So that is also gone.

On Clarendon Avenue there is space for overflow parking, but it is rather limited when you look at the number of spaces that may be needed by workers as well as staff who currently use some of

the Woodside Avenue parking. That's going to be taken away. It's by YGC.

In addition the EIR states that a remote parking facility will be identified for workers and staff. I'd like to ask where that will be in San Francisco. Where is this spare land; where is this spare parking? Maybe San Bruno. I don't know. Maybe they can find some down there.

It also suggests that workers on the project will -- a portion of them car pool or use transit. I have yet to see construction people haul their tools in on transit or even car pool. I think

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they all come by truck.

Another element: The parking study area is flawed. It includes Pacheco Street, all the way up to the 9th and Pacheco entrance to Forest Hill as a possible site for parking overflow. Anyone familiar with the topography of Forest Hill knows that no one is going to park on Pacheco and walk down to Laguna Honda.

Ironically the parking study area does not include Idora or Ulloa Streets, which are directly across from the Youth Guidance Center and Laguna Honda Hospital. So I think that needs to be rethought.

I also just want to echo something Ms. Balestreri commented on: Regional access routes. She is right. I mean, Dewey Boulevard can't handle the traffic. And in the EIR it suggested that really trucks coming from the south will use 280 and exit at San Jose Avenue.

Well if anyone has ever tried to negotiate that exit on San Jose, take that hard right to get to Bozworth to Oshaughnessy, I challenge a large truck to do it without running into something. So I think traffic originating from the south won't be able to use 280 as the EIR states and that they will be

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forced to divert themselves onto Portola, Claremont, and then onto Dewey.

From the east it's suggested that they can use 280 and exit Monterey Boulevard and come up Oshaughnessy, but I also challenge them to take Monterey and hang the hard right and go past the Glen Park BART station. That's a traffic nightmare to begin with.

So I suggest that what they're probably going to do in the near future will be using the Fell Street offramp on 101, but that's later to be demolished while they're rebuilding Octavia Boulevard.

So what I'm asking is that the EIR in its final draft really articulate exactly what routes the construction people and the large trucks should take, because right now the alternatives that are discussed really aren't realistic. And as anyone who resides west of Twin Peaks, including Commissioner Theoharis,

knows if you get lost, you can end up on some very tiny streets that lead you in circles. And we really would prefer the trucks and drivers not be forced to do that.

In addition, the last element is that they show trucks leaving the project using 7th Avenue

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going to Lincoln Way to access 19th Avenue. You cannot take a left-hand turn on 7th Avenue. So what they're going to be forced to do is to turn left at Irving/Judah, which doesn't have a signal for left turns. And Irving and Judah are both transit thoroughfares.

PRESIDENT THEOHARIS: Thank you. Your time is up.

Some of these cards got a little mixed up because folks wanted to get in. So anyone who wants to speak who hasn't spoken, please come up. And make sure you state your name for the record.

MR. PARRINO: Good afternoon, ladies and gentlemen. My name is Richard Parrino. I am also part of the St. John's/St. Brendan's organizing committee. I live at 53 Idora, right across the street from the Laguna Honda project.

Today I'd like to address the major construction impact issues mentioned in the draft EIR as directly affecting the surrounding neighbors. The two major issues are that of construction vehicles and also the excavation process.

Under the Transportation and Circulation and Parking section, and based on the preliminary construction plans, quote: Truck traffic will range

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from average of seven trucks per day to a peak of 15 trucks.

Our preliminary analysis breakdown is as follows: The general contractor and supervisory

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vehicles would range from approximately 20 to 30 vehicles. This consists of half-ton to one-ton trucks. Now if there was a concrete pour during this time of approximately 200 to 300 yards, that would mean 25 to 40 Ready-Mix trucks, eight yard trucks, cycling in and out of Laguna Honda.

Now during another phase of the construction and at the same time, though, but a different phase, if there were architectural construction going on, such as mechanical and electrical interior finish-out work, that would impose about another 50 construction vehicles. As you can see this totals between 95 and 120, not 15.

In the same section it states that, quote: During most phases of the construction, it is anticipated that construction-related parking could be accommodated within the project site. But during the peak construction period, the contractor may need to make arrangements at remote parking facilities off site.

It also states that construction traffic

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affects would not be considered significant. We consider the hundred-plus vehicles or trucks to be very significant and would like restrictions imposed on the contractor preventing any construction parking or ushering of construction vehicles on the adjoining streets.

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Now under the Construction Noise it states, quote: During all construction phases there will be close coordination between the construction staff and hospital staff.

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There's no mention about the residents here. We would like specific measures to keep the community, the residents in the community, informed, like maybe biweekly or monthly meetings.

Now under the Proposed Rate and Utility Plan section there's a statement that says: Although cut and fills would be balanced on site, trucks would need to haul building materials to the campus.

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We would like to see specific restrictions on these grading operations that require on-site cycling or hauling of the cut-and-fill material within the site itself, not off the site.

Ladies and gentlemen, this is all about safety and we would like these items implemented. Thank you.

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PRESIDENT THEOHARIS: Thank you.

Next speaker.

MS. WHARTON: My name is Ann Wharton, and I live at 62 Ulloa and I'm member of the San Francisco local organizing project.

My concern is what's going to happen to all of us when we also have Laguna Honda -- I mean also have YGC being built and all of a sudden we have all this construction. There's not going to be any room for the neighbors.

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PRESIDENT THEOHARIS: Next speaker.

Thank you.

MS. FANELLI: Okay. First, now last.

My name is Eileen Fanelli. I live at 51 Idora Avenue. We've lived in that house for about 11 years.

You have heard several members of our community -- St. John/St. Brendan local organizing committee -- and there are others here today as well that are not speaking. I hope that you have -- and in addition to our oral comments here we are going to be submitting written comments.

I hope that what you have heard that is most disconcerting to us after our concerted and good-faith efforts to work collaboratively with

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Laguna Honda project teams in meetings that we have held over the last year and a half is that the EIR scope does not reflect the community's input on project impacts~~impasse~~.

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The CEQA process is designed to ensure an

Note to reviewers: this comment needs to be added to Comment 90.

open and inclusive planning process. The lack of a public scoping meeting, the failure of the EIR to reference St. John and St. Brendan local organizing committee's written and verbal comments, and the failure to provide a detailed description of the project scope all violate the spirit and legal intent of CEQA. The EIR is therefore incomplete, in addition to being inaccurate in many areas.

The project description in particular is incomplete. It must include integration of institutional scale of the project with the residential scale of the surrounding community. This key project projection was required to meet the bond commitment of improved access and to remove the physical and psychological barrier between the hospital and the neighborhood.

There must be a detailed description of the project construction elements including ADA access and material stations and concrete work and work sequencing in a manner that we can evaluate its

impacts, along with the cumulative impacts which are not really addressed for the adjacent YGC construction project.

Specific construction traffic routes must be identified. Restrictive covenants on traffic, parking, and cycling of trucks on neighborhood streets must be put in place prior to issuing building permits. Analysis of traffic impacts due to the entrance off Idora should be completed. This has been an item that many have spoken to and has been something that we asked the project team to do for several months as part of the scoping process.

The parking analysis must be expanded to include Ulloa, Idora, and parts of Portola, as these will be the closest streets to the new entrance and light for access to the hospital.

Finally access must be addressed for patients, volunteers, workers, and the neighborhood. The EIR states that the project will not increase pedestrian/bike traffic. I believe it's on page 1-5. But the EIR has got it wrong here. A prime project objective was to increase pedestrian/bike patient and worker access between the hospital and the neighborhood.

Not only the physical hospital plans, but

also the quality of the lives affected by the hospital should be improved by this project.

Thank you very much.

PRESIDENT THEOHARIS: Thank you.

Next speaker, please.

MS. WALD: My name is Deborah Wald. I live at 926 Dellbrook Avenue, which means I am the corner lot that shares two -- two-fourths of my property line is shared with Laguna Honda Hospital property. That is I have two fence lines where they are literally my neighbor. Therefore I'm very very

concerned about the actual construction process and the impact it's going to have on the quality of life of my family and my neighbors, all of whom are homeowners in that neighborhood.

As I'm sure you all know, the neighborhood did support Laguna Honda Hospital, the project to rebuild Laguna Honda Hospital, and we come here in a spirit of wanting to work together. However we have some grave concerns about the noise issues and particularly want to make sure that they are being addressed with regard to the YGC construction and the reservoir construction.

We have three major construction projects going on in a quite small residential neighborhood

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simultaneously, and I have not heard the cumulative impact of those three projects happening simultaneously addressed anywhere.

The property of Laguna Honda Hospital is truly a gem. It's a gem I very much appreciate. The green space there cannot be replaced. I am deeply concerned about the impact of the construction on the green space that is there.

I found out last night, which particularly concerns me, that there is a temporary power plant that is planned to be put essentially in my backyard. It could not be closer to the property lines of the Dellbrook Avenue corner properties. And it is not included in the environmental impact report at all because it is only a temporary facility.

However "temporary" on a 10-year construction project means it will be there until my children are in college. That is not, to me, "temporary."

Therefore I believe that there are a number of similar situations that need to be addressed regarding noise, regarding the amount of dust and debris that will be created in our neighborhood, the impact on the green space around our homes.

And I would like to see the full oversight

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process addressed more thoroughly in terms of there's a huge project and the plan is not detailed enough to make clear where the checks are on how it's going along the way, where the oversight process happens to make sure that there aren't budget shortfalls that mean that things that are taken out that are supposed to be rebuilt don't actually get rebuilt.

I assume there will be a hospital there at the end of this process, but there are very ambitious landscaping plans. I am deeply concerned that those may not be fully implemented because of the economic world that we live in. And so I'm concerned about the oversight process and the ongoing checks along the way and do not see a thorough process for that.

And as I said, I'm very concerned about -- I don't see an analysis anywhere of how this project will interplay with the YGC and reservoir project in

terms of noise level; in terms of traffic; in terms of, as I say, dust and debris. I know that there's substantial hazardous waste on the site, in terms of like paint and in terms of asbestos; and how our neighborhood will be protected from this level of construction all around us is a grave concern to me.

Thank you.

PRESIDENT THEOHARIS: Thank you.

Next speaker.

MR. PAUL: My name is John Paul. I live at 160 Dellbrook. I also own property at 72 Dellbrook, which has its backyard directly on the property. In fact both of these properties do.

My concern is that the EIR does not divulge or does not inform people of many things about this particular project. It seems that first off there are going to be seven-story monster towers. They are going to be placed, in fact the institutional scale of things, they are going to be placed not in a valley but on top of the two hills behind this property.

We understood originally that they were going to be in the valley. Instead they are on top of the hills, and they are then going to tower over our houses. We have a residential scale. There are two-story house as a general rule in the area. These are monsters. They're going to be imposed on us. The physical plan, okay, is going to be huge. Looking down our streets, we're going to see these giant buildings over the top of our houses.

The operational noise, it's going to make a bowl. If you look at the shape of the way this is going to be built, it focuses all the noise from generators, from any vehicles that drive, will be reflected off the faces of the buildings towards the hill. The sound also rises, which means it's going to go right in the back of our houses as it does now.

Laguna Honda has never been a good neighbor. We fully and completely support the replacement of the facility, but not in the manner they are going to do it. The EIR does not address, for example, the fact that the non-native species of eucalyptus trees that are presently there are a fire hazard. They have never cut those.

In asking last night about that, the trees are such that they will fall and hit our houses. That is called an act of God and we will not get any reimbursement for that, and yet Laguna Honda does not have the money to be able to eliminate those type of things.

They are a non-native species. They've been there for how long. Their leaves continue to block our downspouts. They block our rain gutters. They are acidic. They destroy our lawns. They blow on our -- the branches fall off, tear our roofs. They

damage our houses.

They've been there for quite some time.

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They are a uniquely wonderful fire hazard, as was proven in the East Bay. Absolutely nothing has been done to mitigate that, and nothing is addressed in the EIR to address that in any way.

As far as the other environmental impacts here, as far as being a good neighbor, the noise that they generate presently, they admitted last night that the generators do not muffle the noises presently but the new ones will. I disagree. I don't think they will.

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They also have a steam plant, the pressure blow offs which will be done on a regular basis. The noise -- in fact one gentleman admitted that he has double-insulated windows on the back of his house and they go right through the double-insulated windows. The gentleman is also hard of hearing.

And so, I mean it's a problem where we have this good neighbor aspect. They haven't been. We do wish to have Laguna Honda replaced. We do like it very much. It's a wonderful place. But the fact that the traffic issues, the changes are not going to mitigate traffic problems. It reduces access to our houses. It stops our ability to get to and from and it makes it extremely difficult to get in and out, especially when three projects are going to be all

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going at the same time.

I think the EIR does not address our issues and does not address the items that we brought to their attention. That propane refueling station as well is not addressed in any place in the EIR. And yet that is going to be there for what? Something in the neighborhood of 10 years. If you've ever seen the explosion that takes place when a propane refueling station goes up, it's not very nice. And it's going to be right on this one woman's back yard.

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Thank you.

PRESIDENT THEOHARIS: Thank you.

Next speaker. Are there any other speakers?

FATHER PETOYAN: Good afternoon. My name is Father Sarkis Petoyan. I'm the pastor of St. John Armenian Church, the other St. John church in the area, 275 Olympia Way.

I wish to speak to just one item. The EIR report dealing with Clarendon Hill east building. That, as a previous speaker mentioned, is a seven-story building. In effect it's built 50 feet higher than anything on Olympia Way. Speaking specifically of my parish.

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I don't think the EIR speaks to the shadow effect of how that building may have a shadow upon my parish, my church, or what it will look like from

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Olympia Way and from the park across the street. If you will, it's the back side of the Laguna Honda Hospital project. My parish is 230 feet away from that building. That building will sit 50 feet higher than mine, my parish. We are worried about the shadow and the sights of that building.

Other than that we support the project. We believe in the project. It's a noble project. I hope they save me one day. I'm sure I'll end up there, as God wills it.

Other than that, I appreciate the time.

PRESIDENT THEOHARIS: Thank you.

Next speaker. Are there any other speakers? Okay. I'm going to close the public comments.

MS. GIRARD-BIRD: I am here to ask for your advice, because I believe --

PRESIDENT THEOHARIS: Excuse me. Would you give your name, please.

MS. GIRARD-BIRD: My name is (phonetic spelling) Solange Girard hyphen Bird. And (unintelligible) and you see I would like you to put

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yourselves in my place as you give me advice. The property that we have is in one of the very most desirable neighborhoods in San Francisco and has been ever since we move in there over 40 years ago. I was ever so grateful that my husband found this house.

Well right now if we sell we are going to get a lot of money, a lot, a lot of money. We had a recent appraisal and we were surprised how it has grown in value. If we wait to sell it until the project is going on, we know that the property value will drop. There's no, no question that it will drop. You see?

So if we move, my dilemma is as follows: If we move out of there, my husband and I are in the last years of this life on earth. He is unwell. Has a very bad degree of some bone ailment, what you call it, osteoporosis. And, you know, he's becoming more and more disabled. If we stayed there he's going to be greatly bothered by the situation. If we move out, he's going to be also. I don't think he can survive either move.

And this is why I am here to consult you on this issue. If you were in my place, would you wait to -- you see, I attended the meeting last night, as I have attended every time that there is something

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going on regarding Laguna Honda. And it was a very good meeting. Very harmonious. Everybody spoke well.

And I would like to believe that the promises of the people who conducted the meeting last night, but I really don't know. I don't know. Where are the guarantees, you know? It's going to be disturbing no matter what. And the question is this: Do we sell and move out? Do we wait until the

thing is in progress, trying to sell the house, losing a lot of money.

Because right now that property, if we put it on the market it would sell within four weeks because it's a very nice place. Well cared for, attractive, and the location and the street, everything is all right about it. There are no flaws. If I wait until the turmoil is on, people are going to look at all of this.

I will listen to what you have to say. If you were in my age, in my condition, and if you own this property, what are the guarantees? Are there any guarantees that the noise will not be so awful (unintelligible). Will we, my husband and I, be able to endure it. Because if we cannot endure and we move, the price drops right away.

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PRESIDENT THEOHARIS: We aren't in a position to answer questions. We only take testimony, not have a dialogue. So we can't respond to you in this process.

MS. GIRARD-BIRD: I deplore that you cannot, because I trusted that you would because I have no one to else to turn to. My family is in Europe. Who should I consult? Can you tell me to whom should I address this problem?

DIRECTOR GREEN: Maybe I can talk to her separate from this item and explain what's going and maybe give her some assistance.

MS. GIRARD-BIRD: I am grateful for that. Where do I wait for you?

DIRECTOR GREEN: Why don't you wait for me outside and I'll come out right now.

PRESIDENT THEOHARIS: That's very gracious of you, Director Green.

MS. GIRARD-BIRD: Yes. I appreciate that.

PRESIDENT THEOHARIS: Okay. Next speaker. Thank you, Director Green.

Next speaker. Are there any other speakers to address the Commission with their comments? Seeing none, I'm going to close the public comments.

Commissioners, your comments? Any comments,

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Commissioners?

My only comment, just for anyone who might not know the full process, these comments will all be addressed and answered in the final EIR. I thought that the public brought up some very good points. Especially I'm concerned about the alternative routes, among other things.

But I appreciate the fact that this group of folks obviously really read this document and asked some very valid questions and spent the time to do it, and I personally appreciate that. I live in West Twin Peaks.

And anyone who wants to, as staff said, if you would like to submit additional written comments, you may do so until the close of business

on January 16. And your written comments should be sent to San Francisco Planning Department, 1660 Mission Street, San Francisco, 94103. Thank you.

(Whereupon, the proceedings in the above matter adjourned at 4:35 P.M.)

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I, ALENE DYER WEIR, do hereby certify that the foregoing transcript was reported in shorthand at the time and place therein stated. I further certify that the foregoing is a full, true and accurate transcription of the proceedings to the best of my ability.

I further certify that I am not of counsel or attorney for any of the parties named in said action, nor in any way interested in the outcome of the cause named in said caption.

Date:

ALENE D. WEIR, CSR #7587